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US EPA RECORDS CENTER REGION 5



1004623

Gregory E. Pflum

Vice President

General Manager

**FEDEX MAIL – TRACKING NUMBER:
7758 3128 6021**

March 9, 2016

Mr. Juan Thomas

Project Manager

United States Environmental Protection Agency

Region V (DE-9J)

77 West Jackson Boulevard

Chicago, Illinois 60604

Subject: Monthly Progress Report Number 264
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 264 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2016. Please find attached CMS Monthly Progress Report Number 213.

Should you need additional information, please contact us at your convenience.

Regards,

Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

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CMS MONTHLY PROGRESS REPORT NO. 213

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	February 1 through February 29, 2016
Date of Report:	March 9, 2016

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel (UTC) Great Lakes Legacy Act (GLLA) project. As part of these ongoing planning activities, the Stakeholders (BASF, Dow, and Arkema) participated in conference calls with USEPA GLNPO on February 5 and 26. BASF also participated in a face to face meeting in Chicago with representatives from USEPA GLNPO and USEPA RCRA on February 11, 2016. Arcadis, the Stakeholder's contractor, participated in a meeting on February 22 with the City of Wyandotte to discuss the GLLA project.

- On February 2, 2016, the Stakeholders requested from USEPA a draft post-dredge management plan (PDMP) for TSCA areas, as well as information regarding the type of commitment needed by GLNPO prior to construction for responsibility of a cap maintenance plan.
- On February 2, 2016, the Stakeholders received from CH2M (USEPA GLNPO's contractor) a revised draft of the habitat plans for the Bishop Park area, which includes a sturgeon spawning reef.

- On February 8, 2016, the Stakeholders provided a draft agenda to USEPA GLNPO for use in planning for the February 11 meeting in Chicago. This was followed by a revised agenda on February 9.
- On February 9 the Stakeholders received dredge depth figures and cross sections, as well as a table summarizing the shoreline features and proposed setbacks and side slopes, from CH2M for review.
- On February 10 the Stakeholders submitted to USEPA a table presenting preliminary shoreline evaluation and recommendations within the UTC GLLA project sub-areas, as well as an accompanying set of figures identifying shoreline features in the project areas.
- On February 22 Arcadis provided to the City of Wyandotte draft cross sections prepared by CH2M for the Bishop Park area, a draft analysis of dredge volumes in this area prepared by CH2M, and a conceptual illustration of a cap for the Bishop Park area. These materials were shared in advance of the February 22 meeting with the City of Wyandotte to discuss the GLLA project in the Upper Trenton Channel.
- On February 23 the Stakeholders received a revised draft NPDES permit application for the UTC GLLA project from CH2M for review. The Stakeholders provided comment.
- On February 26 the Stakeholders received information regarding the project design boundaries from USEPA GLNPO for review. These materials included selected cross-sections for the North Works project area, a set of figures showing model output, and historical core logs.

Uplands

- On February 4 BASF received a letter from USEPA requesting that interactive spatial analysis tool in the previously established SharePoint site to allow for easier data sharing in the future. BASF met with USEPA on February 11 in part to discuss this request. The request was clarified during a call on February 26; the interactive spatial analysis tool will be developed for the ePrism platform with a March target delivery date.
- On February 4 USEPA requested that BASF respond to questions raised following the December 2015 meeting in Chicago. BASF is evaluating the request and will respond in March.
- On February 17 BASF requested the approval status for the Offsite sentinel well work plan that was submitted to USEPA in October 2015. BASF forwarded a copy of the Work Plan and comments were received from USEPA on February 29. BASF is evaluating the

comments and will respond in March. Once the Work Plan is approved by USEPA BASF will commence with installation of the offsite sentinel/monitoring wells.

- On February 26 BASF receive an email correspondence from USEPA requesting that the individual appendices for the Draft CMS (submitted to USEPA in June 2015) be uploaded to the SharePoint site. The request was completed February 27.
- Preparations continued for the CO2 Proof of Concept test. The test will be initiated following approval to install the offsite sentinel/monitoring wells.

1b. Summary of Changes Made to the CMS

- No changes were made during February 2016 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- None this month.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None this month.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #263 to the USEPA on February 8.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Sentinel well installation and the CO2 pilot test preparations will continue; field work commencement is contingent on USEPA approval of Work Plan, weather, and subcontractor coordination.

- BASF, Arkema, Dow, and USEPA-GLNPO are continuing with the UTC design project process.
- The 1st Q 2016 groundwater performance monitoring effort will commence.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Filum
Vice President
General Manager



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Gregory E. Pflum

Vice President
General Manager

**FEDEX MAIL – TRACKING NUMBER:
7753 7263 6609**

January 8, 2016

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 262
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 261 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2015. Please find attached CMS Monthly Progress Report Number 211.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "Greg E. Pflum".

Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

CMS MONTHLY PROGRESS REPORT NO. 211

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	December 1 through December 31, 2015
Date of Report:	January 8, 2016

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel (UTC) Great Lakes Legacy Act (GLLA) project. As part of these ongoing planning activities, the Stakeholders (BASF, Dow, and Arkema) participated in conference calls with USEPA GLNPO on December 4, 10, and 17.

- On December 1 the Stakeholders provided comments on the NPDES permit application prepared by CH2M for the *Temporary Water Treatment System for Detroit River Upper Trenton Channel (UTC) Dredging Activities*.
- On December 2 CH2M and Arcadis discussed soft sediment modeling details pertaining to the North Works shoreline (dredge cut figures and soft sediment modeling information previously provided by CH2M).
- On December 3 the Stakeholders received a draft Bishop Park cost evaluation, with advantages and disadvantages for dredging and for capping, for review.

- On December 10 the Stakeholders submitted a revised draft proposed post dredge management plan to USEPA GLNPO for review.
- On December 21 the Stakeholders requested a technical meeting with USEPA RCRA and GLNPO in person to discuss and finalize the Post-Dredge Management Plan (PDMP).
- On December 21 the Stakeholders acknowledged USEPA-GLNPO's decision not to pursue the potential lower-cost option of disposing of a portion of the dredged material from the UTC GLLA project at the United States Army Corps of Engineers (USACE) Point Mouillee Confined Disposal Facility (CDF).
- On December 22 the Stakeholders received the final *2015 Field Site Sampling Technical Memorandum* for review.

Uplands

- On December 15 BASF met with USEPA-RCRA in Chicago (and MDEQ via phone) to present a high level CMS summary and discuss the path forward. It was agreed that BASF is on track with the overall strategy for the site. Formal comments on the draft CMS Report will be provided to BASF 1stQ 2016. USEPA requested that the final CMS Report be a "stand-alone" document. Additional and specific items were also discussed at the meeting.
- On December 17 USEPA-RCRA emailed a meeting summary. BASF is reviewing the summary and will respond as appropriate in January.

1b. Summary of Changes Made to the CMS

- No changes were made during December 2015 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- None this month.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None this month.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #261 to the USEPA on December 9.
- BASF submitted the October Consent Decree groundwater sampling activities summary memo MDEQ and USEPA on Dec. 11.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Sentinel well installation and the CO2 pilot test preparations will continue; field work commencement is contingent on Agency concurrence with the work scope and weather.
- BASF, Arkema, Dow, and USEPA-GLNPO are continuing with the UTC design project process.
- The Stakeholders requested a technical meeting with USEPA RCRA and GLNPO in person to discuss and finalize the Post-Dredge Management Plan (PDMP). This meeting may occur in January.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Hilum
Vice President
General Manager



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Gregory E. Pflum
Vice President
General Manager

**FEDEX MAIL – TRACKING NUMBER:
7755 9468 0064**

February 8, 2016

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 263
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 263 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2015. Please find attached CMS Monthly Progress Report Number 212.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "G. E. Pflum".

Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

CMS MONTHLY PROGRESS REPORT NO. 212

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	January 1 through January 31, 2016
Date of Report:	January 8, 2016

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel (UTC) Great Lakes Legacy Act (GLLA) project. As part of these ongoing planning activities, the Stakeholders (BASF, Dow, and Arkema) participated in conference calls with USEPA GLNPO on January 7, 14, and 29.

- On January 6 the Stakeholders received draft figures and cross sections of the Bishop Park area from USEPA GLNPO for review and discussion. These materials were prepared assuming a dredge scenario, but depict the cap elevation on the cross sections in the potential cap areas.
- On January 5 and 13 the Stakeholders submitted follow up requests for a meeting with representatives from the non-federal partners, USEPA GLNPO, and USEPA RCRA to resolve key remaining aspects of the project approach in order to proceed to the 30% design stage. These requests follow the prior December 21, 2015 request. BASF received confirmation of the February 11 meeting from USEPA GLNPO on January 20.
- On January 15 the Stakeholders received draft figures, cross sections and volumes associated with modeled TSCA removal areas in the UTC for review.

- On January 15 USEPA GLNPO forwarded selected pages from *Appendix D – Shoreline and Utility Conditions Survey of the Final Focused Feasibility Study for the Upper Trenton Channel* (USEPA 2013) to the stakeholders for reference.
- On January 21 the Stakeholders received a proposed post-dredge management plan for soft sediment removal areas from USEPA GLNPO for review. The proposal differed from the PDMP that the Stakeholders had previously submitted. On January 28 the Stakeholders provided a list of discussion points to USEPA GLNPO, and requested clarification on these points during the regularly-scheduled project team call on January 29.

Uplands

- Preparations continued for the CO2 Proof of Concept test. The test will be initiated 1st Q 2016 weather permitting.
- Preparations also continued for installation of the offsite sentinel wells at locations approved by MDEQ and USEPA.

1b. Summary of Changes Made to the CMS

- No changes were made during January 2016 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- None this month.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None this month.

1g. Key Project Personnel Changes

- None.

CMS MONTHLY PROGRESS REPORT NO. 212

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	January 1 through January 31, 2016
Date of Report:	January 8, 2016

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel (UTC) Great Lakes Legacy Act (GLLA) project. As part of these ongoing planning activities, the Stakeholders (BASF, Dow, and Arkema) participated in conference calls with USEPA GLNPO on January 7, 14, and 29.

- On January 6 the Stakeholders received draft figures and cross sections of the Bishop Park area from USEPA GLNPO for review and discussion. These materials were prepared assuming a dredge scenario, but depict the cap elevation on the cross sections in the potential cap areas.
- On January 5 and 13 the Stakeholders submitted follow up requests for a meeting with representatives from the non-federal partners, USEPA GLNPO, and USEPA RCRA to resolve key remaining aspects of the project approach in order to proceed to the 30% design stage. These requests follow the prior December 21, 2015 request. BASF received confirmation of the February 11 meeting from USEPA GLNPO on January 20.
- On January 15 the Stakeholders received draft figures, cross sections and volumes associated with modeled TSCA removal areas in the UTC for review.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #262 to the USEPA on January 8.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Sentinel well installation and the CO2 pilot test preparations will continue; field work commencement is contingent on weather and subcontractor coordination.
- BASF, Arkema, Dow, and USEPA-GLNPO are continuing with the UTC design project process.
- The Stakeholders requested a technical meeting with USEPA RCRA and GLNPO in person to discuss and finalize the Post-Dredge Management Plan (PDMP). This meeting has been scheduled for February 11 in Chicago.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Plum
Vice President
General Manager



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Gregory E. Pflum

Vice President

General Manager

**FEDEX MAIL – TRACKING NUMBER:
7751 5621 8880**

December 9, 2015

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 261
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 260 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2015. Please find attached CMS Monthly Progress Report Number 210.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "Gregory E. Pflum".

Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

CMS MONTHLY PROGRESS REPORT NO. 210

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	November 1 through November 30, 2015
Date of Report:	December 9, 2015

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel (UTC) Great Lakes Legacy Act (GLLA) project. As part of these ongoing planning activities, the Stakeholders (BASF, Dow, and Arkema) participated in conference calls with USEPA GLNPO on November 5, 12, and 19.

- On November 4 the Stakeholders received a draft Sediment Volume Summary Table from USEPA GLNPO for review. A revised draft of this table was provided on November 16.
- On November 5 the Stakeholders received a revised version of the sediment processing staging plan for the Arkema property for review.
- On November 6 the Stakeholders received a draft set of figures depicting the depth to clay for the project areas for review.

- On November 9 the Stakeholders received an initial draft of the NPDES permit application to be submitted to MDEQ for the Upper Trenton Channel sediment dredging project for review.
- On November 10 the Stakeholders received Attachment 4 to the 2015 Field Site Sampling Technical Memorandum for review. This attachment contained all geotechnical data collected by USEPA-GLNPO's contractor that have been received to date.
- On November 10 Arcadis (the Stakeholder's contractor) and CH2M (USEPA GLNPO's contractor) participated in a conference call with USEPA GLNPO to discuss the results of treatability studies completed thus far in support of the remedial design.
- On November 16 Arcadis received files documenting the clay surface developed for the UTC project site from CH2M for review.
- On November 23 the Stakeholders received from CH2M draft figures showing dredge depths for review.

Uplands

- On November 3 Arcadis and BASF presented the CO2 addition to groundwater Proof of Concept plan to the MDEQ Technical Advisory Panel (TAPs) for peer review and approval. MDEQ panel recommended approval of the work in a letter that was received on November 12.
- The October Consent Decree groundwater sampling summary memo is being prepared and will be submitted to MDEQ and USEPA in December.

On November 12 BASF received a letter from USEPA with responses and comments to the CO2 diffusion pilot test work plan that was submitted in October. The letter also stated that BASF could proceed with implementation of the work plan. BASF prepared a response to these comments and these will be submitted to USEPA. The work plan will be implemented in January 2016.

- The approximate installation locations of both offsite monitoring and sentinel wells have been discussed with USEPA and MDEQ and this work will be completed as a work plan

addendum to the Offsite Investigation work plan. Both the USEPA and MDEQ did not have any issues to where the wells would be located. This task is tentatively scheduled to be completed in conjunction with the CO2 diffusion pilot test for January.

- BASF will meet USEPA on December 15 in Chicago to present a high level summary and discuss the submittal of the CMS (June, 2015) and then the next steps.

1b. Summary of Changes Made to the CMS

- No changes were made during November 2015 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- None this month.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None this month.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #260 to the USEPA on November 9.
- BASF submitted Work Plan product as described in Section 1a.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- USEPA and MDEQ will continue review of the draft CMS Report submitted by BASF on June 25.
- The October Consent Decree groundwater sampling summary memo will be prepared and submitted the MDEQ and USEPA in December.

- The Q4 Performance Groundwater Monitoring summary memo will be prepared and submitted in December.
- A meeting with USEPA and MDEQ has been scheduled for December 15 to discuss the CMS report that was submitted by BASF in June.
- Sentinel well installation and the CO2 pilot test preparations will continue; field work commencement is contingent on Agency concurrence with the work scopes.
- BASF, Arkema, Dow, and USEPA-GLNPO are continuing with the UTC design project process.
- Discussions will continue regarding establishment of a Polychlorinated Naphthalene (PCN) clean up goal (CUG) for the UTC project. While PCNs are a primary UTC project chemical of concern (COC), no formal cleanup criteria currently exist.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Pflum
Vice President
General Manager



The Chemical Company

Gregory E. Pflum
Vice President
General Manager

FEDEX MAIL – TRACKING NUMBER:
798157300075

March 10, 2014

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 240
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 240 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2014. Please find attached CMS Monthly Progress Report Number 189.

Should you need additional information, please contact us at your convenience.

Regards,



Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

MID 064 141 . .

CMS MONTHLY PROGRESS REPORT NO. 189

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	February 1 through February 28, 2014
Date of Report:	March 10, 2014

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

- BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel Great Lakes Legacy Act project. As part of these ongoing planning activities, BASF participated in conference calls with USEPA GLNPO on February 19 and 28.
- On February 19, a PDF file identifying data use objectives, data needs and sample types for remedial design, as well as a summary description of Alternative 4, was forwarded to USEPA GLNPO for discussion.
- On February 19, USEPA GLNPO provided a file containing the sign in sheet from the public meeting held on January 15 in Wyandotte.
- On February 28, the non-federal partners (including BASF) provided a document summarizing a *Proposed Approach to Develop a Clean-Up Goal For Chlorinated Naphthalenes in the Upper Trenton Channel* to USEPA GLNPO for review and discussion.

Uplands

- BASF submitted the CMS DNAPL Investigation Work Plan on January 14, 2014. USEPA provided comments via letter dated January 30. A follow up call with the USEPA and MDEQ was held on February 18th and the comments on the work plan were discussed. Some of the comments were sufficiently addressed verbally on the call and BASF is preparing a

response to the remainder of comments. The response to comments will be submitted to USEPA and MDEQ.

- BASF submitted CMS work plans for the Shipping Channel Investigation and the Southern Property Boundary Investigation on January 28. Per the conference call held on February 18th, when the USEPA and the MDEQ have completed their review of these two CMS investigation work plans a conference call will be scheduled with the agencies to discuss and questions and/or comments for the work plans. BASF may provide additional information on these work plans if required based on the outcome of the call.
- An email was sent to the USEPA (MDEQ copied) dated Feb. 10th informing the agencies that due to the harsh winter conditions in Michigan this winter that the scheduled start of the field work will be delayed until April. This delay in the schedule should not affect the final delivery date for the submission of the CMS.
- The CMS work plan for the Geochemical Investigation is currently being prepared and will be submitted in March.

1b. Summary of Changes Made to the CMS

- No changes were made during February 2014 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- Severe cold and record snowfall in January, February, and March have greatly limited field work opportunities in southeast Michigan. This will impact commencement of the CMS field programs however at this time no impact to the CMS report delivery date of June 2015 is anticipated.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- BASF is evaluating revision of the site groundwater model.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #239 to the USEPA on February 10.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF, Arkema, Union Carbide, and USEPA-GLNPO are continuing with the UTC design project process.
- The first quarter Performance Groundwater Sampling is scheduled to be performed on March 11, 12, and 13th.
- BASF is planning/implementing the CMS Work Plan tasks following USEPA approval of the Work Plans and moderation of the severe winter weather.
- BASF is preparing and will submit a response to USEPA comments to the CMS DNAPL Investigation Work Plan.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Pflum
Vice President
General Manager



The Chemical Company

Gregory E. Pflum
Vice President
General Manager

**FEDEX MAIL – TRACKING NUMBER:
7978 6476 7541**

February 10, 2014

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 239
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 239 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2014. Please find attached CMS Monthly Progress Report Number 188.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "G. Pflum".

Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

CMS MONTHLY PROGRESS REPORT NO. 188

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	January 1 through January 31, 2014
Date of Report:	February 10, 2014

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Sediments

- BASF continues to engage with USEPA GLNPO and make progress on the Upper Trenton Channel Great Lakes Legacy Act project. As part of these ongoing planning activities, BASF participated in conference calls with USEPA GLNPO on January 8, 13, 23 and 27.
- On January 7, USEPA GLNPO provided draft posters for use in the January 15 public meeting for review. BASF provided comment on the posters on January 10 and USEPA GLNPO forwarded the proposed final posters on January 10.
- USEPA GLNPO provided BASF with a draft public meeting email invitation and agenda for review on January 8.
- On January 9 USEPA GLNPO provided draft updated language for the Great Lakes Legacy Act Upper Trenton Channel website. BASF provided suggested revisions to the language later that same day, and USEPA GLNPO provided the final language on January 10.
- On January 9, USEPA GLNPO forwarded questions regarding cost documentation during the (prior) feasibility phase of the Upper Trenton Channel project. On January 24 BASF provided responses to these questions.
- On January 14 a copy of the Upper Trenton Channel Database, v. 2.0, was forwarded to USEPA GLNPO at Amy Mucha's request.
- On January 15 BASF accompanied USEPA to a public meeting held in Wyandotte to discuss the Upper Trenton Channel Focused Feasibility Study and ongoing planning for the

remedial design phase of the project. BASF also participated in a follow up public teleconference on January 29.

- On January 23, USEPA GLNPO provided a file summarizing quality assurance considerations from Great Lakes Legacy Act Data Reporting Standard for use in field sampling plan and quality assurance project plan development on the Upper Trenton Channel project.
- Project progress reports for the periods April 1, 2013 through September 29, 2013, were submitted to USEPA GLNPO on January 24. At the same time, a report documenting costs related to pre-design investigation activities for the period January 28, 2013 through September 29, 2013, was submitted to USEPA GLNPO. Invoice backup for each of these periods was forwarded to USEPA GLNPO in a separate transmittal at the same time.
- On January 27 a PDF file showing the proposed locations for additional analytical cores in the Upper Trenton Channel and an accompanying Excel file were forwarded to USEPA GLNPO for discussion. These items had been previously developed during discussions with GLNPO in early 2013.

Uplands

- BASF submitted the CMS DNAPL Investigation Work Plan to USEPA and MDEQ on January 14. USEPA provided comments via letter dated January 30. BASF is preparing a response to these comments.
- BASF submitted CMS work plans for the Shipping Channel Investigation and the Southern Property Boundary Investigation to USEPA and MDEQ on January 28.
- The CMS work plan for the Geochemical Investigation is currently being prepared and will be submitted in February.
- Preparations continue for work plan implementation tasks as weather allows.

1b. Summary of Changes Made to the CMS

- No changes were made during January 2014 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- Severe cold and record snowfall in January and February have greatly limited field work opportunities in southeast Michigan. This will impact commencement of the CMS field

programs however at this time no impact to the CMS report delivery date of June 2015 is anticipated.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- BASF is evaluating revision of the site groundwater model.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #238 to the USEPA on January 9.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF, Arkema, Union Carbide, and USEPA-GLNPO are continuing with the UTC design project process.
- BASF is planning/implementing the CMS Work Plan tasks following USEPA approval of the Work Plan. Actual implementation will be in part dependent on weather conditions.
- BASF is preparing and will submit a response to USEPA comments to the CMS DNAPL Investigation Work Plan.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Pflum
Vice President
General Manager



The Chemical Company

Gregory E. Pflum
Vice President
General Manager

**FEDEX MAIL – TRACKING NUMBER:
797592359740**

January 9, 2014

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 238
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 238 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2013. Please find attached CMS Monthly Progress Report Number 187.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink, appearing to read "Greg E. Pflum".

Gregory E. Pflum

Attachment

cc: Tracy Kecskemeti – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF
A. Mucha - USEPA

CMS MONTHLY PROGRESS REPORT NO. 187

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	December 1 through December 31, 2013
Date of Report:	January 9, 2014

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF participated in conference calls with USEPA GLNPO December 6, 12, and 20.
- On December 4 hard copies of the Final Focused Feasibility Study Report, Upper Trenton Channel, Detroit River Area of Concern were forwarded to the Bacon Memorial Library and the Riverview Public Library for inclusion in the public records repository.
- On December 5 a draft proposed basis for non-federal partner cost share for the remedial design phase was forward to USEPA GLNPO for review and discussion.
- On December 6 USEPA GLNPO provided a draft list of task items for the remedial design phase for review. This was followed by an updated list on December 20.
- On December 10 project progress reports for the periods October 24, 2011 through April 22, 2012 were submitted to USEPA GLNPO with associated invoice backup.
- On December 11 project progress reports for the periods April 23, 2012 through March 31, 2013 were submitted to USEPA GLNPO with associated invoice backup.
- On December 12 BASF received word that the GLLA Design Project Agreement had been signed by USEPA. The PA commits BASF to participation in the next phase of

the voluntary Upper Trenton Channel sediment effort with GLNPO, Arkema, and Union Carbide.

- Planning continued for a public meeting to present the recommendations from the UTC FS report. The meeting has been scheduled for January 15, 2014. USEPA GLNPO provided a draft public meeting notice and revised fact sheet for the Sediment Cleanup Plan for Upper Trenton Channel for review December 3. A revised public meeting notice was provided to BASF on December 11 for review, accompanied by a draft public meeting invitation. BASF provided comments on the public meeting notice on December 11; arrangements were also made with the local paper to publish a notice for the public meeting once per week until the public meeting takes place. USEPA GLNPO provided a final public meeting invitation on December 17.
- On December 18, 2013, BASF provided USEPA GLNPO with a figure showing the Alternative 4 outline from the Final Focused Feasibility Study Report for the Upper Trenton Channel for inclusion in the public meeting presentation.
- USEPA GLNPO provided files summarizing data needs in the Upper Trenton Channel for review and discussion on the December 20, 2013 conference call.

Uplands

- On December 17 a webinar conference was held with the USEPA and MDEQ to discuss the CMS path forward and schedule. The revised schedule was accepted with the acknowledgment from the group that it is a very aggressive schedule and the understanding that it will need to be flexible. Work Plans will be prepared for the field tasks to be completed and will be submitted for agency concurrence on the objectives and approach. A formal review of the work plans will not be requested. A full summary and action items of the meeting was prepared by USEPA and sent to MDEQ and BASF for review. BASF is reviewing the meeting summary and will offer comments and edits and submit back to USEPA and MDEQ for concurrence and implementation.
- On December 31 BASF delivered a copy of the 2013 quarterly performance groundwater monitoring program and the twice annual 1986 consent decree sampling program summary.

1b. Summary of Changes Made to the CMS

- No changes were made during December 2013 other than as discussed in this report.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in this report.

1d. Problems/Issues Encountered and Resolutions

- None this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- BASF is evaluating revision of the site groundwater model.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #237 to the USEPA on December 10.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF, Arkema, Union Carbide, and USEPA-GLNPO are continuing with the UTC design project process.
- BASF is planning/implementing the CMS Work Plan tasks following USEPA approval of the Work Plan. Actual implementation will be in part dependent on weather conditions.
- Arcadis will continue with preparations for implementation of CMS elements following the meeting with USEPA.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



Gregory E. Pflum
Vice President
General Manager



The Chemical Company

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Products Better™

J.D. Purvis
Vice President
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0683**

December 9, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 201
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 201 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2010. Please find attached CMS Monthly Progress Report Number 150.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	A. Mucha - USEPA

CMS MONTHLY PROGRESS REPORT NO. 150

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	November 1 through November 30, 2010
Date of Report:	December 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF's consultant completed the 4th Quarter performance monitoring data collection the week of November 15th. The data will be compiled into the 2010 data summary report for distribution to the Michigan Department of Natural Resources and Environment (MDNRE) and USEPA.
- On Monday November 15 a representative of the MDNRE was at the North Works to observe BASF's contractor collect measurements from existing groundwater monitoring wells.
- Field notes from United States Environmental Protection Agency (USEPA) Pore Water Sampling Collection work along BASF North Works completed the week of October 25 were received on November 16.
- BASF participated in conference calls with Great Lakes National Program Office (GLNPO), Legacy Site Services, Inc. (LSS) and ARCADIS on November 23, 2010 to discuss items related to the Upper Trenton Channel Great Lakes Legacy Act (GLLA) project.

1b. Summary of Changes Made to the CMS

- No changes were made during November 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA-RCRA however the overall schedule was not significantly impacted.
- USEPA-RCRA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan during calendar year 2010. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF and USEPA-RCRA implemented the dispute resolution process and the matter was resolved through USEPA's June 23rd letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #200 to the USEPA on November 10th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will respond to EPA-RCRA's preliminary comments to the draft IMDWP when received from USEPA-RCRA.
- BASF will review USEPA-RCRA's October field notes and data.
- BASF, Arkema, and USEPA-GLNPO will commence with the upper Trenton Channel Supplemental Sampling and Feasibility Analysis field efforts once the USEPA contractor is retained and SOPs prepared.
- BASF is preparing the annual performance monitoring data package for distribution 1st Quarter 2011.

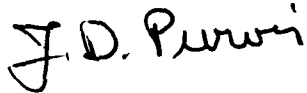
- BASF's contractor will resurvey site groundwater monitoring wells at North Works. The work is weather dependent.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION

A handwritten signature in black ink, appearing to read "J.D. Purvis". The signature is written in a cursive, flowing style.

J.D. Purvis
Vice President
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date December 10, 2010
Pages 1 of 5
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

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J.D. Purvis
Vice President
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7006 2760 0003 0406 6650**

November 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 200
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 200 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2010. Please find attached CMS Monthly Progress Report Number 149.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	A. Mucha - USEPA

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel. (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 149

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	October 1 through October 31, 2010
Date of Report:	November 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On October 1 BASF, Arkema and USEPA-GLNPO signed a Project Agreement for the upper Trenton Channel Supplemental Sampling and Feasibility Analysis project. Work scope/SOP preparations and contractor procurement for this voluntary effort are underway.
- On October 19th BASF was informed by USEPA-RCRA of their intent to implement a pore water collection plan off of the North Works shoreline. This work was counter to the path forward set during BASF's meeting with USEPA-RCRA on September 16th to discuss the draft Interim Measure Design Work Plan (IMDWP) that was submitted by BASF in August. Rather than providing comments to this document as mutually agreed USEPA-RCRA instead pulled together a plan to collect additional water samples.
- On October 20th USEPA-RCRA provided BASF with a copy of the final sampling SOP and the schedule for implementation, October 25th through 29th. On short notice BASF reviewed this submittal and provided USEPA-RCRA with comments regarding approach and technical concerns on October 25th.
- USEPA-RCRA implemented their plan as scheduled October 25th through 29th.

1b. Summary of Changes Made to the CMS

- No changes were made during October 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA-RCRA however the overall schedule was not significantly impacted.
- USEPA-RCRA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan during calendar year 2010. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF and USEPA-RCRA implemented the dispute resolution process and the matter was resolved through USEPA's June 23rd letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #199 to the USEPA on October 11th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will respond to EPA-RCRA's preliminary comments to the draft IMDWP when received from USEPA-RCRA.
- BASF will review USEPA-RCRA's October field notes and data when supplied by USEPA.
- BASF will implement the 4th Quarter performance monitoring effort the week of November 15th. The Michigan MDNRE has asked to participate and BASF will coordinate.
- BASF, Arkema, and USEPA-GLNPO will commence the upper Trenton Channel Supplemental Sampling and Feasibility Analysis field efforts once the USEPA contractor is retained and SOPs prepared (underway). Initial efforts may commence in November but will likely extend into spring 2011.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION

A handwritten signature in black ink that reads "J.D. Purvis". The signature is written in a cursive style with a large, stylized "J" and "P".

J.D. Purvis
Vice President
General Manager



The Chemical Company

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Products Better™

J.D. Purvis
Vice President
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0676

October 11, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 199
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 199 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2010. Please find attached CMS Monthly Progress Report Number 148.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink that reads "J.D. Purvis".

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 148

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	September 1 through September 30, 2010
Date of Report:	October 11, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- The 3rd quarter performance groundwater monitoring program was conducted September 27th through the 29th.
- BASF met with USEPA in Chicago on September 16th to discuss the draft Interim Measure Design Work Plan (IMDWP) that was submitted by BASF in August.
- The third quarter of videotaping of fish and their habitat offshore in the Detroit River was completed on September 17th.
- Project Agreement negotiations between USEPA, BASF, and Arkema are underway for the upper Trenton Channel Supplemental Sampling and Feasibility Analysis project application.

1b. Summary of Changes Made to the CMS

- No changes were made during September 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

Monthly Progress Report
October 11, 2010

- USEPA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan during calendar year 2010. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF and USEPA implemented the dispute resolution process and the matter was resolved through USEPA's June 23rd letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #198 to the USEPA on September 10th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

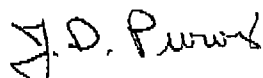
- BASF will respond to EPA's preliminary comments to the Draft IMDWP when received from EPA.
- BASF anticipates approval of the upper Trenton Channel Supplemental Sampling and Feasibility Analysis Project Agreement in early October. Assuming approval, field efforts would begin in October/early November.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
Vice President
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date October 11, 2010
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.

NOTE: October 10th (the due date) fell on a Sunday, and Monday was Columbus Day. Therefore, there isn't any Postal Service until Tuesday, October 12, 2010.



The Chemical Company

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Products Better™

J.D. Purvis
Vice President
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0669**

September 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 198
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 198 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2010. Please find attached CMS Monthly Progress Report Number 147.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 147

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	August 1 through August 31, 2010
Date of Report:	September 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF's consultant continued preparation of the draft RCRA Interim Measures Design Work Plan (IMDWP). The draft IMDWP was to USEPA on schedule on August 18th. A follow-up meeting with USEPA has been tentatively scheduled for September 16th in Chicago to discuss the draft and any questions or comments regarding the submittal.

1b. Summary of Changes Made to the CMS

- No changes were made during August 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.
- USEPA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan during calendar year 2010. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF and USEPA implemented the dispute resolution process and the matter was resolved through USEPA's June 23rd letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #197 to the USEPA on August 10th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

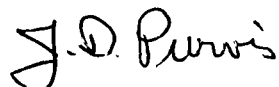
- The performance monitoring for North Works for the third quarter is scheduled to be completed in September.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
Vice President
General Manager



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J.D. Purvis
Vice President
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0669

September 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 198
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 198 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2010. Please find attached CMS Monthly Progress Report Number 147.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink that reads "J.D. Purvis".

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	



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J.D. Purvis
Vice President
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0652

August 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 197
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 197 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2010. Please find attached CMS Monthly Progress Report Number 146.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 146

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	July 1 through July 31, 2010
Date of Report:	August 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF participated in a conference call on July 22nd with USEPA to discuss the proposed outline of the Interim Measures Design Work Plan (IMDWP).
- BASF participated in a face to face meeting with USEPA in Chicago on July 30th to discuss the project footprint development, design considerations, and the proposed interim measure that will be presented in IMDWP.
- In response to the Great Lakes Legacy Act Request for Projects, BASF co-submitted an Upper Trenton Channel – Supplemental Sampling and Feasibility Study application to USEPA on July 21st. On July 30th a meeting was held in Chicago to discuss the elements of the application.

1b. Summary of Changes Made to the CMS

- No changes were made during July 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.
- USEPA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan during

calendar year 2010. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF and USEPA implemented the dispute resolution process and the matter was resolved through USEPA's June 23rd letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #196 to the USEPA on July 12th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

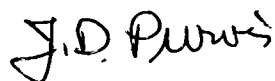
- BASF continued preparing the Interim Measures Design Work Plan (IMDWP) for sediments adjacent to the site. The IMDWP is due to be submitted to USEPA on August 18th in response to the requirements outlined in USEPA's June 23rd letter to BASF.
- The performance monitoring for North Works for the third quarter is scheduled to be completed in September.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
Vice President
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date August 10, 2010
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

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Products Better™

J.D. Purvis
Vice President
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0645**

July 12, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 196
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 196 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2010. Please find attached CMS Monthly Progress Report Number 145.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 145

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	June 1 through June 30, 2010
Date of Report:	July 12, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On June 1st BASF submitted an invocation of formal dispute resolution letter to USEPA in response to USEPA's May 18th letter. USEPA's May 18th letter included multiple points of disagreement between BASF and USEPA regarding facts and data interpretation and demanded remedy implementation during calendar year 2010. BASF requested that these points be addressed and resolved as called for under the dispute resolution process.
- On June 9th and June 21st BASF and USEPA participated in dispute resolution conference calls that discussed the content of USEPA's and BASF's letters.
- On June 23rd USEPA issued a letter to BASF that withdrew the provision in the May 18 letter directing BASF "to submit within 30 days of receipt of this letter, for EPA review and approval, an *Interim Measure Design Work Plan for Sediment Removal*, including a schedule for implementation and completion of the sediment removal remedy during the 2010 calendar year." The letter instead directed BASF to submit an *Interim Measure Design Work Plan* (IMDWP) by August 18, 2010, for EPA review and approval.
- BASF's consultant completed the 2nd quarter performance groundwater monitoring event.

1b. Summary of Changes Made to the CMS

- No changes were made during June 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.
- USEPA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan during calendar year 2010. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF and USEPA implemented the dispute resolution process and the matter was resolved through USEPA's June 23rd letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #194 to the USEPA on June 10th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF's consultant will continue review of USEPA's data files and laboratory reports received on March 4th, after BASF's March 1st submittal.
- BASF will continue preparation of the *Interim Measures Design Work Plan* as outlined in USEPA's June 23rd letter.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
Vice President
General Manager



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J.D. Purvis
Vice President
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 1758**

June 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 195
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 195 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2010. Please find attached CMS Monthly Progress Report Number 144.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 144

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	May 1 through May 31, 2010
Date of Report:	June 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Letter dated May 18 received from USEPA calling for BASF to prepare an Interim Measures Design Work Plan for sediment removal and implementation of the plan.
- BASF evaluated USEPA's May 18th letter and began preparation of its response.
- BASF's consultant began planning for the 2nd Quarter groundwater monitoring effort scheduled for the week of June 14.

1b. Summary of Changes Made to the CMS

- No changes were made during May 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.
- USEPA issued a letter to BASF by e-mail on May 18th (US Mail on May 27th) calling for preparation of an IM Design Work Plan for sediments and implementation of the plan. Initial review the letter by BASF identified multiple points of disagreement regarding facts and data interpretation. BASF is preparing its formal response to the letter.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #194 to the USEPA on May 10th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work


- BASF will respond to USEPA's May 18th letter.
- BASF's consultant will continue review of USEPA's data files and laboratory reports received on March 4th, after BASF's March 1st submittal.
- BASF's consultant will conduct the 2nd quarter performance groundwater monitoring event, tentatively scheduled for the week of June 14.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
Vice President
General Manager

Jun. 10. 2010 3:18PM BASF Site Admin

No. 2196 P. 1



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date June 10, 2010
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0638

May 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 194
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 194 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2010. Please find attached CMS Monthly Progress Report Number 143.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 143

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	April 1 through April 30, 2010
Date of Report:	May 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Preparations for the 2nd Quarter groundwater monitoring effort began.
- Preparation of the supplemental data collection plan continued pending EPA comment to BASF's March 1st submittal.

1b. Summary of Changes Made to the CMS

- No changes were made during April 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #193 to the USEPA on April 7th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

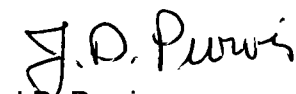
- BASF will continue of USEPA's data files and laboratory reports that were received on March 4th.
- Pending response from USEPA to BASF's March 1st submittal, BASF will facilitate a stakeholder conference call regarding possible sediment-related data gaps and plans to address same.
- BASF is tentatively scheduled to meet with USEPA-GLNPO representatives on May 21st regarding USEPA's proposed GLLA Trenton Channel project.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0607

April 7, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 193
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 193 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2010. Please find attached CMS Monthly Progress Report Number 142.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 142

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	March 1 through March 31, 2010
Date of Report:	April 7, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Submitted the Electronic Data Deliverable for Analytical Data from 2009 Sediment Interim Measures Investigation on March 1, 2010 to USEPA, MDNRE, and GLNPO.
- Submitted the 2009 Sediment Characterization/Remedial Evaluation Interim Measures Draft Data Package on March 1, 2010 to USEPA, MDNRE, and GLNPO.
- Received email from USEPA on March 4, 2010 containing USEPA's data files and laboratory reports containing results of the sediment toxicity and analytical testing on split samples from field work conducted in October 2009 and began review.
- Measured depth to groundwater and field parameters in site monitoring wells.

1b. Summary of Changes Made to the CMS

- No changes were made during March 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.



1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted the Electronic Data Deliverable for Analytical Data from 2009 Sediment Interim Measures Investigation on March 1, 2010 to USEPA, MDNRE, and GLNPO.
- BASF submitted the 2009 Sediment Characterization/Remedial Evaluation Interim Measures Draft Data Package on March 1, 2010 to USEPA, MDNRE, and GLNPO.
- BASF submitted Monthly Progress Report. #192 to the USEPA on March 10th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will continue of USEPA's data files and laboratory reports that were received on March 4th.
- Pending response from USEPA, BASF will facilitate a stakeholder conference call regarding possible sediment-related data gaps and plans to address same.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION

J.D. Purvis
General Manager



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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0591**

March 10, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 192
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 192 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2010. Please find attached CMS Monthly Progress Report Number 141.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 141

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	February 1 through February 28, 2010
Date of Report:	March 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis continued with data validation and analysis and draft IM report preparation efforts.

1b. Summary of Changes Made to the CMS

- No changes were made during January 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF transmitted the January 26th draft meeting summary to USEPA for comment on February 5th.
- BASF submitted Monthly Progress Report. #191 to the USEPA on February 9th.
- BASF submitted copies of the January 26th meeting slides and video to USEPA on February 9th.
- BASF submitted the 2008 and 2009 North Works site groundwater monitoring data to MDNRE in electronic form on February 17th.
- BASF provided a copy of the March 2009 Phase II Sediment Investigation: Data Summary Report to USEPA-GLNPO on February 22nd.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- USEPA will continue with sediment sample analysis and toxicity testing and will provide BASF with the results when available.
- BASF will prepare and provide to USEPA the draft 2009 Sediment Characterization/Remedial Evaluation Interim measures Draft Data package on March 1st

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0584

February 9, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 191
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 191 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2010. Please find attached CMS Monthly Progress Report Number 140.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 140

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	January 1 through January 31, 2010
Date of Report:	February 10, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF and USEPA (RCRA and GLNPO) personnel met January 26 at USEPA Region V offices in Chicago for the fourth of four scheduled data share meetings. MDNRE personnel participated by phone. Discussion topics included the preliminary findings from the Benthic Community and Trident Probe Assessments conducted as part of BASF's IM Work Plan implementation efforts, BASF's initial thoughts regarding the overall data set and upriver vs. along site context, and the path forward. Regarding the Benthic Community Assessment, benthic organisms were observed at all locations upstream and along site, and the data indicate that multiple factors govern community composition besides pH. Regarding the Trident Probe data, pore water samples were not correlative with bulk surface sediment alkalinity and no surface water pH analysis exceeded 8. The data and interpretations were presented by BASF as preliminary and both the data and statistical methodology will be shared with USEPA as part of the agreed-to IM process. Additional data needs were discussed based on the recent data and refinements to the Site model resulting from the 2009 assessment efforts.
- On January 28th USEPA e-mailed its position regarding its need for the data and methods used by BASF to develop the January 26th presentation. As presented by BASF on the 26th, the information is being compiled and will be provided to USEPA in February.
- Data validation efforts and IM report preparation also continued.

1b. Summary of Changes Made to the CMS

- No changes were made during January 2010.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #190 to the USEPA on January 11th.
- BASF submitted a summary of 2008 and 2009 North Works site groundwater monitoring data to MDNRE on January 18th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work


- Arcadis will continue with data validation and analysis and IM report preparation efforts.
- USEPA will continue with sediment sample analysis and toxicity testing and will provide BASF with the results when available.
- BASF will prepare and provide to USEPA several deliverables including: a copy of the January 26th presentation slides and the underwater video survey of the vegetation and fish observed off of the North Works site, and the data and description of the statistical methodologies employed to develop the presentation. BASF also will prepare and submit a request for re-consideration of the project timeline in lieu of the data gaps discussed during the January 26th meeting.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION


J.D. Purvis
General Manager



The Chemical Company

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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0577

January 11, 2010

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 190
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 190 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2009. Please find attached CMS Monthly Progress Report Number 139.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 139

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	December 1 through December 31, 2009
Date of Report:	January 11, 2010

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Continued data validation and analysis of samples collected during the benthic community sampling effort.
- Continued data validation evaluating data collected as part of the implementation of the Interim Measures Work Plan (IM Work Plan).
- Continued preparation of IM Report.
- Continued preparation for data share meeting with USEPA/MDEQ scheduled for January, 2010
- Continued preparation of plan to replace certain upland monitoring wells that were removed as part of site expansion activities.

1b. Summary of Changes Made to the CMS

- No changes were made during December 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #189 to the USEPA on December 10, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

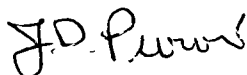
- Arcadis will continue with data validation and analysis and will provide results when available.
- USEPA will continue with sediment sample analysis and toxicity testing and will provide results when available.
- The fourth data share meeting with USEPA/MDEQ is tentatively scheduled for the morning of January 26, 2010

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J. D. Purvis
General Manager



The Chemical Company

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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0560**

December 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 189
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 189 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2009. Please find attached CMS Monthly Progress Report Number 138.

Should you need additional information, please contact us at your convenience.

Regards,


J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 138

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	November 1 through November 30, 2009
Date of Report:	December 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Received chemical data from samples collected from the benthic community sample locations data and initiated data validation and analysis.
- Received the final report from subcontractor who performed the sediment profile imaging. Initiated review of the report.
- Continued data validation evaluating data collected as part of the implementation of the Interim Measures Work Plan (IM Work Plan).
- Completed performance groundwater monitoring.
- Continued preparation of IM Report.
- Initiated preparation for data share meeting with USEPA/MDEQ scheduled for January, 2010
- Continued preparation of plan to replace certain upland monitoring wells that were removed as part of site expansion activities.

1b. Summary of Changes Made to the CMS

- No changes were made during November 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Please see Section 1a.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #188 to the USEPA on November 9, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

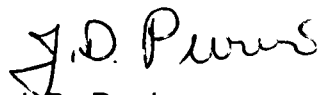
- Arcadis will continue with data validation and analysis and will provide results when available.
- USEPA will continue with sediment sample analysis and toxicity testing and will provide results when available.
- The fourth data share meeting with USEPA/MDEQ is tentatively scheduled for the week of January 18, 2010

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0553**

November 9, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 188
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 188 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2009. Please find attached CMS Monthly Progress Report Number 137.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 137

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	October 1 through October 30, 2009
Date of Report:	November 9, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Participated in a conference call on October 1, 2009 with United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) to discuss proposed benthic community sample locations and the collection of sediment samples for analyses to be completed by USEPA.
- Continued to coordinate with USEPA, MDEQ, and TechLaw (USEPA oversight contractor) in regards to sampling oversight logistics and the collection of sediment samples for USEPA analyses.
- Successfully completed benthic community sample collection and processing and submittal of benthic community samples for laboratory analysis.
- Initiated data validation for analytical data from sediment cores collected in August and September 2009.
- Continued preparation of plan to replace certain upland monitoring wells that were removed as part of site expansion activities.

1b. Summary of Changes Made to the CMS

- No changes were made during October 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time and tasks added at the direction of USEPA however the overall schedule was not significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Successfully completed benthic community sample collection and processing (Step 4 from the Sediment Collection/ Remedial Evaluation Interim Measures Work Plan [IMWP]) and submittal of benthic community samples for laboratory analysis.
- Initiated data validation for analytical data from sediment cores collected in August and September 2009.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #187 to the USEPA on October 12, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will continue with sample analysis and data validation and provide results when available.
- USEPA will continue with sediment sample analysis and toxicity testing and will provide results when available.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0539

October 12, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 187
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 187 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2009. Please find attached CMS Monthly Progress Report Number 136.

Should you need additional information, please contact us at your convenience.

Regards,


J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa



CMS MONTHLY PROGRESS REPORT NO. 136

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	September 1 through September 30, 2009
Date of Report:	October 12, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Completed sediment core collection and processing (Step 2 from the Interim Measures Work Plan [IMWP]) and submittal of sediment samples for laboratory analysis.
- Review of sediment core field data (including lithological descriptions and bulk pH measurements) to select Step 3 sample locations. Participated in a conference call on September 9, 2009 with United States Environmental Protection Agency (USEPA) and Michigan Department of Environmental Quality (MDEQ) to discuss proposed sample locations.
- Successfully completed Step 3 of the IMWP activities, including Sediment Profile Imaging (SPI) and sediment-water interface and near bottom water collection (using the Trident probe).
- Review of SPI results, as well data from previous investigations (Total Organic Carbon [TOC] and grain size data from October 2008 core samples) to select Step 4 sample locations for benthic community analysis. Participated in a conference call on September 30 with USEPA and MDEQ to discuss benthic community analysis locations and logistics for collection of sediment for toxicity testing to be performed by USEPA.
- Continued to coordinate with USEPA, MDEQ, and USEPA oversight contractor in regards to sampling oversight logistics.
- USEPA requested that BASF provide split samples from the benthic community analysis phase of the project. The technical and logistical aspects were still being discussed as of September 30.

1b. Summary of Changes Made to the CMS

- No changes were made during September 2009.



1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time however the overall schedule should not be significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- The SPI results were distributed prior to the September 30 conference call.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #186 to the USEPA on September 10, 2009.
- BASF provided preliminary SPI photographs for USEPA use September 25.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis is scheduled to complete the remainder of the field efforts outlined in the final IM Work Plan.
- Arcadis will begin data validation of chemical testing results on receipt from the laboratory.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION

J.D. Purvis
General Manager



The Chemical Company

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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0546**

September 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 186
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 186 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2009. Please find attached CMS Monthly Progress Report Number 135.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 135

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	August 1 through August 31, 2009
Date of Report:	September 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On August 12 BASF and Arcadis, USEPA, and MDEQ participated in the first of multiple data exchange teleconference calls. The agenda was presentation of the bathymetric survey data completed in July. During the call, locations were selected for the sediment coring program.
- On August 25 – 31, Arcadis began implementation of the work scope as presented in BASF's final "*Sediment Characterization/Remedial Evaluation Interim Measures Work Plan*," (IM Work Plan). Tasks undertaken included: established survey control, cleared utilities, collected sediment cores from the study area, and processed the cores for chemical testing. Approximately 80% of the cores were collected. The remainder will be collected in early September.

1b. Summary of Changes Made to the CMS

- No changes were made during August 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The *IM Work Plan* discussions extended beyond the anticipated time however the overall schedule should not be significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- The bathymetric survey results were distributed during the August 12 conference call.

- Approximately 80% of the sediment cores were collected and samples submitted for analysis during August. The results will be distributed as part of the final report during the 4th Quarter 2009.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted the final "*Sediment Characterization/Remedial Evaluation Interim Measures Work Plan*," to USEPA on August 4.
- BASF submitted Monthly Progress Report. #185 to the USEPA on August 10, 2009.
- BASF provided an additional copy of the October 2008 QAPP for USEPA use August 13.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis is scheduled to complete the remainder of the field efforts outlined in the final IM Work Plan.
- Additional data exchange calls are scheduled for September 9 and 30.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

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J D Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0522

August 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 185
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 185 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2009. Please find attached CMS Monthly Progress Report Number 134.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 134

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	July 1 through July 31, 2009
Date of Report:	August 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On July 1 and July 8, BASF and Arcadis, USEPA, and MDEQ participated in teleconference discussions of the draft *Sediment Characterization/Remedial Evaluation Interim Measures Work Plan* that was submitted by BASF on June 2. The work scope was designed to address data gaps identified from the Phase II program and outlined the path to 1) further define physical characteristics of sediment deposits along the North Works site from Transect 16 south to Transect 29 (study area); 2) further delineate pH values in sediments in the study area; 3) evaluate physical, biological, and geochemical conditions at sediment-water interface in the Study Area; 4) evaluate the benthic community in the study area and a reference area; and 5) provide additional sediment chemical analysis in Study Area outside the boundary of the existing Phase II Sediment investigation cores.

Based on discussions, BASF agreed to modify the draft *IM Work Plan* to reflect USEPA's input by 1) doubling the number of geochemical samples to 20 at locations to be jointly selected by USEPA and BASF; 2) modifying the constituent analyte list to match the Phase II list for VOCs, SVOCs, and metals; 3) submitting samples for analysis of pore water ammonia at the benthic community sample locations, with USEPA or MDEQ to provide the analytical methodology; 4) modifying the benthic community analysis assessment text presented in the draft *IM Work Plan* to indicate that other data may prove useful or appropriate, such as bioassays.

- In a letter dated July 14, USEPA expanded on the outcome of these discussions and proposed additional modifications to the draft *IM Work Plan*. BASF and Arcadis are reviewing the July 14 letter and revising the draft *IM Work Plan* to reflect the previous and additional Agency comments. The revised draft *IM Work Plan* will be provided to USEPA in early August, tentatively August 3.

1b. Summary of Changes Made to the CMS

- No changes were made during July 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None outside of participation on conference calls and/or document cc copies.

1d. Problems/Issues Encountered and Resolutions

- The draft *IM Work Plan* discussions have extended beyond the anticipated time however the overall schedule should not be significantly impacted.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Due to scheduling limitations for the specialized equipment needed to complete the work, the bathymetric survey *IM Work Plan* element was conducted on July 9 as originally proposed. As a result, the bathymetric survey data will be available for use by BASF and the Agencies as part of the sediment core location selection process in early August.
- As summarized in the June report, groundwater elevations were measured in site and background groundwater monitoring wells in June. The draft memorandum is now in review and the data will be provided with the next update.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #184 to the USEPA on July 8, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF is preparing the revised draft *IM Work Plan* and its response to USEPA's July 14 letter. Both will be submitted to USEPA in early August, tentatively August 3. A conference call has been tentatively proposed for August 11 to discuss the revised *IM Work Plan* and to jointly select sediment coring locations. Field efforts will commence in August following Agency approval of the final *IM Work Plan*.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

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J D Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 003 0609 0515

July 8, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 184
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 184 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2009. Please find attached CMS Monthly Progress Report Number 133.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink that reads "J.D. Purvis".

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 133

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	June 1 through June 30, 2009
Date of Report:	July 8, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On June 2 BASF submitted the draft *Sediment Characterization/Remedial Evaluation Interim Measures Work Plan* as agreed to at the March 2009 meeting with USEPA and as modified per USEPA's letter of May 4. The work scope was designed to address data gaps identified from the Phase II program and outlined the path to 1) further define physical characteristics of sediment deposits along the North Works site from Transect 16 south to Transect 29 (study area); 2) further delineate pH values in sediments in the study area; 3) evaluate physical, biological, and geochemical conditions at sediment-water interface in the Study Area; 4) evaluate the benthic community in the study area and a reference area; and 5) provide additional sediment chemical analysis in Study Area outside the boundary of the existing Phase II Sediment investigation cores.

1b. Summary of Changes Made to the CMS

- No changes were made during June 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems or issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Groundwater elevations were measured in site and background groundwater monitoring wells in June. The data will be provided with the next update.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #183 to the USEPA on June 10, 2009.
- BASF submitted the draft Sediment Characterization/Remedial Evaluation Interim Measures Work Plan to the USEPA for comment and approval on June 2, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

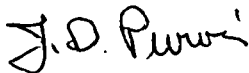
- BASF and USEPA have scheduled a conference call for July 1 to discuss the draft Sediment Characterization/Remedial Evaluation Interim Measures Work Plan. BASF will prepare the final work plan to reflect Agency comments after conclusion of the discussion(s). Field efforts will commence in July per the agreed-to schedule following Agency approval of the final Work Plan.
- BASF will revise the draft Phase II Sediment Investigation: Data Summary Report on receipt of comments from USEPA. The draft document was submitted for review in March 2009.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **June 8, 2009**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **J.D. Purvis**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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Products Better™

J D Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0508

June 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 183
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 183 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2009. Please find attached CMS Monthly Progress Report Number 132.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink that reads "J.D. Purvis".

J.D. Purvis

Attachment

cc: L. Aubuchon – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
J. McKenna – Arcadis
M. Gerdenich – BASF

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
B. Diepeveen – BASF

CMS MONTHLY PROGRESS REPORT NO. 132

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	May 1 through May 30, 2009
Date of Report:	June 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On May 1 BASF submitted a Work Plan Outline as agreed to at the March 2009 meeting with USEPA. The work scope was designed to address data gaps identified from the Phase II program and outlined the path to 1) further define physical characteristics of sediment deposits along the North Works site from Transect 16 south to Transect 29 (study area); 2) further delineate pH values in sediments in the study area; 3) evaluate physical, biological, and geochemical conditions at sediment-water interface in the Study Area; 4) evaluate the benthic community in the study area and a reference area; and 5) provide additional sediment chemical analysis in Study Area outside the boundary of the existing Phase II Sediment investigation cores.
- On May 4, BASF received a letter from USEPA dated April 24 that mandated that the agreed-to Work Plan be submitted as an Interim Measures (IM) Work Plan.
- On May 14 BASF, Arcadis, USEPA, and the MDEQ participated in a conference call to discuss the draft Work Plan Outline, the April 24 USEPA letter, and initial comments regarding BASF's draft Phase II report submittal that is currently in Agency review. On the call and in a follow-up communication USEPA emphasized their interest in defining the distribution of sediment with pH values exceeding 9, defining the IM Work Plan process and timeline into 2010, clarification of proposed sample compositing intervals, and selection protocol for the (upstream) ecological reference locations. USEPA agreed to supply references supporting their proposed sediment sample compositing intervals.
- On May 28, USEPA supplied BASF with references that discussed their proposed sediment sampling intervals for benthic community analysis.

1b. Summary of Changes Made to the CMS

- No changes were made during May 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- As discussed in Section 1a.

1d. Problems/Issues Encountered and Resolutions

- No problems or issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- None.

1f. Groundwater Modeling Activities and Summary of Findings

- None.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #182 to the USEPA on May 8, 2009.
- BASF submitted a Work Plan Outline to the USEPA on May 1, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will submit the draft *Sediment Characterization/Remedial Evaluation Interim Measures Work Plan* (IM Work Plan) in June for Agency review. The IM Work Plan will provide the basis to further delineate the extent of elevated pH in study area sediments, understand the ecological significance of elevated pH values measured in certain sediment cores, and provide data necessary for evaluating remedial alternatives and selecting an appropriate interim measure. Implementation planning will commence based on the proposed IM Work Plan timeline.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION

J.D. Purvis

J.D. Purvis
General Manager

Jun. 10. 2009 2:58PM

No. 1765 P. 1



The Chemical Company

Fax Cover Sheet

LU-9J

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date June 10, 2009
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From **J.D. Purvis**

Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

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Products Better™

J D Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0492**

May 8, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 181
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 182 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2009. Please find attached CMS Monthly Progress Report Number 131.

Should you need additional information, please contact us at your convenience.

Regards,

J D Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	J. McKenna – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 131

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	April 1 through April 30, 2009
Date of Report:	May 8, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis continued preparation of the Phase III work plan outline as agreed to at the March 2009 meeting with USEPA.

1b. Summary of Changes Made to the CMS

- No changes were made during April 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- None.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- Arcadis Project Manager Theo von Wallmenich has been replaced with John McKenna.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #181 to the USEPA on April 10, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will submit the draft Phase III work plan outline USEPA and the MDEQ on May 1. This draft will be the subject of a teleconference with USEPA and MDEQ during May, the time and date TBA.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J D Purvis
General Manager



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J D Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7001 2510 0008 9246 2249**

April 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 181
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 181 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2009. Please find attached CMS Monthly Progress Report Number 130.

Should you need additional information, please contact us at your convenience.

Regards,

J D Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	T. von Wallmenich – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

BASF Corporation
1809 Biddle Avenue
Wyandotte, MI 48192-3729
Tel: (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 130

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	March 1 through March 31, 2009
Date of Report:	April 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis completed data validation efforts from the Phase II sediment sampling program. The results were included in the *BASF North Works Phase II Investigation: Draft Summary Report* that was transmitted to USEPA and Michigan DEQ on March 31.
- BASF, USEPA, and MDEQ met in Chicago March 19 to discuss the December 2008 Preliminary Data Package, the data statistical evaluation, the path forward and schedule.

1b. Summary of Changes Made to the CMS

- No changes were made during February 2009.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- MDEQ participated in the March 19 meeting by telephone.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- None.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #180 to the USEPA on March 10, 2009.
- BASF submitted *BASF North Works Phase II Investigation: Draft Summary Report* to USEPA and MDEQ on March 31, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will submit a draft work plan outline to USEPA and the MDEQ on April 29. This draft will be the subject of a teleconference with USEPA and MDEQ during May, the time and date TBA.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J D Purvis
General Manager



The Chemical Company

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J D Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1350 0005 4967 8948**

March 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 180
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 180 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2009. Please find attached CMS Monthly Progress Report Number 129.

Should you need additional information, please contact us at your convenience.

Regards,

J D Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	T. von Wallmenich – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 129

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	February 1 through January 28, 2009
Date of Report:	March 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis continued data validation efforts from the sediment sampled collected in October and November 2008.
- Arcadis completed the data validation process for the final background groundwater quality sampling event.
- BASF and USEPA agreed to hold a conference call and meeting in Chicago to discuss preliminary sediment data results and path forward.

1b. Summary of Changes Made to the CMS

- No changes were made during February.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis collected site-wide groundwater elevation measurements from groundwater monitoring, observation, and extraction wells in February.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #179 to the USEPA on February 10, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will continue sediment data validation efforts with completion expected in March. BASF and USEPA will meet in Chicago on March 19th to discuss the preliminary results.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J D Purvis
General Manager



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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4851 1555

February 10, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 179
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 179 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2009. Please find attached CMS Monthly Progress Report Number 128.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	T. von Wallmenich – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 128

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	January 1 through January 31, 2009
Date of Report:	February 10, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis continued data validation efforts from the sediment sampled collected in October and November. This process will continue in February.

1b. Summary of Changes Made to the CMS

- No changes were made during January.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.
- Arcadis continued data validation efforts from the sediment sampled collected in October and November.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #178 to the USEPA on January 9, 2009.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will continue data validation efforts. BASF and USEPA will schedule a meeting to discuss the results when data validation is completed. BASF proposes to meet the week of March 16 to discuss the data set.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J D Purvis
General Manager



The Chemical Company

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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0485**

January 9, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 178
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 178 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2008. Please find attached CMS Monthly Progress Report Number 127.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	T. von Wallmenich – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 127

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	December 1 through December 31, 2008
Date of Report:	January 9, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Construction was completed on the Outfall 003 box sewer upgrade project. Sealed HDPE piping was placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.
- Arcadis began data validation efforts from the sediment sampled collected in October and November.

1b. Summary of Changes Made to the CMS

- No changes were made during December.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.
- Arcadis began data validation efforts from the sediment sampled collected in October and November.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

January 9, 2009

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #177 to the USEPA on December 10, 2008.
- On December 4 BASF submitted to USEPA and MDEQ the document titled *BASF North Works Phase II October 2008 Preliminary Sediment Investigation Field Data*. The report contained sediment core descriptions, field and pH data from the October-November coring program.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will continue data validation efforts. BASF and USEPA will schedule a meeting to discuss the results when data validation is completed.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J D Purvis
General Manager



The Chemical Company

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J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0485

January 9, 2009

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 178
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 178 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2008. Please find attached CMS Monthly Progress Report Number 127.

Should you need additional information, please contact us at your convenience.

Regards,


J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	T. von Wallmenich – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 127

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	December 1 through December 31, 2008
Date of Report:	January 9, 2009

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Construction was completed on the Outfall 003 box sewer upgrade project. Sealed HDPE piping was placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.
- Arcadis began data validation efforts from the sediment sampled collected in October and November.

1b. Summary of Changes Made to the CMS

- No changes were made during December.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.
- Arcadis began data validation efforts from the sediment sampled collected in October and November.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

Jan. 9. 2009 3:17PM
Monthly Progress Report
January 9, 2009

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #177 to the USEPA on December 10, 2008.
- On December 4 BASF submitted to USEPA and MDEQ the document titled *BASF North Works Phase II October 2008 Preliminary Sediment Investigation Field Data*. The report contained sediment core descriptions, field and pH data from the October-November coring program.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**3a. Anticipated Work**

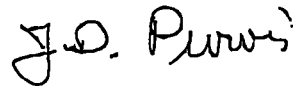
- Arcadis will continue data validation efforts. BASF and USEPA will schedule a meeting to discuss the results when data validation is completed.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J D Purvis
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date January 9, 2009
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0478**

December 10, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 177
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 177 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2008. Please find attached CMS Monthly Progress Report Number 126.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	T. von Wallmenich – Arcadis	B. Diepeveen – BASF
	M. Gerdenich – BASF	

CMS MONTHLY PROGRESS REPORT NO. 126

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	November 1 through November 30, 2008
Date of Report:	December 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis collected the final two sediment cores from the works scope as presented in BASF's "Phase II Sediment Investigation: Core Collection and Analysis Work Plan" (Sediment Work Plan). The remaining two cores were sited in the marina north of the North Works property.
- Construction on the Outfall 003 box sewer upgrade project continued with completion now anticipated for December. Sealed HDPE piping is being placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.
- Elevation measurements were made for the site groundwater piezometers and wells.
- Approximately 170 cubic yards of excavated soil and debris were excavated and disposed off site in October from the new warehouse construction site. The material was uncovered during the construction efforts. The material met the requirements for off site disposal as non-hazardous daily cover material at a Type II landfill. Eight drums of debris and tar collected from an earlier construction effort near the JPP construction site also were disposed of off site in October.

1b. Summary of Changes Made to the CMS

- No changes were made during November.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- BASF communicated with MDEQ and USEPA representatives on November 12 to discuss the coring effort and plans to distribute data.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis personnel collected sediment samples from the Detroit River coring program as outlined in the Sediment Work Plan and QAPP.
- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #176 to the USEPA on November 10, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will prepare a preliminary data package for distribution to USEPA and MDEQ that will include sediment core descriptions, field and pH data from the October-November coring program.
- Construction will continue on the Outfall 003 box sewer upgrade project.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

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Products Better™

J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0454

November 10, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 176
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 176 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2008. Please find attached CMS Monthly Progress Report Number 125.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	T. von Wallmerich - Arcadis
	M. Gerdenich – BASF	B. Diepeveen – BASF

CMS MONTHLY PROGRESS REPORT NO. 125

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	October 1 through October 31, 2008
Date of Report:	November 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis implemented the works scope as presented in BASF's "Phase II Sediment Investigation: Core Collection and Analysis Work Plan" (Sediment Work Plan). All but two cores were collected. The remaining two cores, both sited in the marina north of the North Works property, are tentatively scheduled for sampling in November pending access.
- Piping from the "A" field groundwater extraction wells to the North Works treatment system building were accidentally cut during on site construction activities. Repairs to the HDPE piping were completed on October 23, withing seven days of the incident.
- Construction on the Outfall 003 box sewer upgrade project continued with completion now anticipated for November. Sealed HDPE piping is being placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.
- Elevation measurements were made for the site groundwater piezometers and wells.

1b. Summary of Changes Made to the CMS

- No changes were made during September.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- MDEQ representatives were on site during the coring effort to observe the core recovery and to collect split samples from the cores.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis personnel collected sediment samples from the Detroit River coring program as outlined in the Sediment Work Plan and QAPP.
- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #175 to the USEPA on October 10, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will complete the sample collection efforts during November.
- Construction will continue on the Outfall 003 box sewer upgrade project.
- Elevation measurements will be made for the site groundwater piezometers and wells.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **November 10, 2008**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **J.D. Purvis**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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Products Better™

J.D. Purvis
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0447

October 9, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 175
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 175 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2008. Please find attached CMS Monthly Progress Report Number 124.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	T. von Wallmerich - Arcadis
	M. Gerdenich – BASF	B. Diepeveen – BASF

CMS MONTHLY PROGRESS REPORT NO. 124

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	September 1 through September 30, 2008
Date of Report:	October 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On September 11, BASF, USEPA, and MDEQ completed a conference call to discuss BASF's draft response to USEPA's comments to BASF's "Phase II Sediment Investigation: Core Collection and Analysis Work Plan" (Sediment Work Plan). The final work plan and QAPP Addendum are being prepared and will be submitted to USEPA in October.
- Extraction well E-2B-NA and its paired piezometer PE-2B-NA were connected to the "A" field treatment system building. The new well was brought on line on September 11.
- Construction on the Outfall 003 box sewer upgrade project continued with completion anticipated in October. Sealed HDPE piping is being placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.

1b. Summary of Changes Made to the CMS

- No changes were made during September.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No discussions were held in September regarding the CMS process.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

UNITED STATES POSTAL SERVICE

GENERATED DURING THIS REPORTING PERIOD
s Report. #174 to the USEPA on September 10, 2008.
ING THE NEXT REPORTING PERIOD

ork plan and QAPP to USEPA for review and approval. The
scheduled to begin on October 14 and continue for
ie Outfall 003 box sewer upgrade project.
e made for the site groundwater piezometers and wells.

Proposed Resolutions

• Sender: Please print your name, address, and ZIP+4 in this box •

J.D. PURVIS
BASF CORPORATION
1609 BIDDLE AVENUE
WYANDOTTE, MI 48192

First-Class Mail
Postage & Fees Paid
USPS
Permit No G-10

J.D. Purvis
J.D. Purvis
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date October 9, 2008
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



Chemical Company

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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0430**

September 10, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 174
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 174 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2008. Please find attached CMS Monthly Progress Report Number 123.

Should you need additional information, please contact us at your convenience.

Regards,

A handwritten signature in black ink that reads 'J.D. Purvis'.

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	T. von Wallmenich - Arcadis
	M. Gerdenich – BASF	B. Diepeveen – BASF

CMS MONTHLY PROGRESS REPORT NO. 123

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis Project Manager:	Michael Erickson
Reporting Period:	August 1 through August 31, 2008
Date of Report:	September 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- On August 29, BASF submitted its draft response to USEPA's comments to BASF's "Phase II Sediment Investigation: Core Collection and Analysis Work Plan" (Sediment Work Plan). BASF, USEPA, and MDEQ have tentatively scheduled a follow-up call for September 11 to discuss the comments. The final document will be prepared and issued following resolution of the comments.
- Construction began in August to connect "A" field replacement extraction well E-2B-NA and its paired piezometer PE-2B-NA to the treatment system building. The effort should be completed during September at which time the new well will be brought on line.
- Approximately 160 cubic yards of DBO were excavated and disposed off site from the new warehouse construction site. The DBO pocket was uncovered during the construction efforts. DBO meets the requirements for off site disposal as non-hazardous daily cover material at a Type II landfill.
- Construction on the Outfall 003 box sewer upgrade project commenced and will continue for approximately two months. Sealed HDPE piping is being placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.

1b. Summary of Changes Made to the CMS

- No changes were made during August.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No discussions were held in August regarding the CMS process.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis continued the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- None.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #173 to the USEPA on August 8, 2008.
- BASF submitted its draft response to USEPA's Sediment Work Plan comments on August 28.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

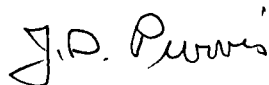
- BASF, Arcadis, USEPA, and MDEQ will discuss comments to the sediment Work Plan in a teleconference scheduled for September 11. The final work plan will be prepared and delivered following resolution of the comments and any additional discussions with USEPA and MDEQ that are needed.
- Construction will continue on the Outfall 003 box sewer upgrade project.
- Elevation measurements will be made for the site groundwater piezometers and wells.
- "A" field replacement extraction well E-2B-NA and its paired piezometer PE-2B-NA will be connected to the North Works groundwater extraction system.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date September 10, 2008
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From J.D. Purvis
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

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J.D. Purvis
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0423**

August 8, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 173
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 173 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2008. Please find attached CMS Monthly Progress Report Number 122.

Should you need additional information, please contact us at your convenience.

Regards,

J.D. Purvis

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

CMS MONTHLY PROGRESS REPORT NO. 122

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	July 1 through July 31, 2008
Date of Report:	August 8, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis began data validation on the June groundwater sampling data. The validated results will be provided to USEPA when available.
- Following notification to USEPA and MDEQ in May, BASF decommissioned nine groundwater monitoring wells (P4-NA, P5-NA, PM2-NA (north), PM2-NA (south), PM3-NA, P2-NA, PZ-1, PZ-2, and PE2-NA) in and adjacent to AOC-6. The removals were necessary as part of site preparations for the new 200,000 square-foot warehouse building now under construction adjacent to AOC-6. The wells will be replaced following completion of construction activities. Further documentation will be provided when available.
- On July 14, BASF submitted the draft "Phase II Sediment Investigation: Core Collection and Analysis Work Plan" to USEPA and MDEQ for comment.
- On July 24, BASF and Arcadis met with USEPA personnel in Chicago to discuss the draft work plan; MDEQ personnel participated by phone. Written comments will be provided to BASF by USEPA in early August.
- "A" field extraction well E-2-NA was decommissioned on July 30 since this location also was within the warehouse footprint. The replacement well (E-2B-NA) was installed the following day approximately 170 feet east of the former location. A soil test boring was first completed adjacent to the new location to confirm the presence and thickness of the native sand unit. The new well will be brought on line as soon as piping work can be completed.

1b. Summary of Changes Made to the CMS

- No changes were made during July.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- BASF personnel met with MDEQ personnel in Lansing on July 29 and 31 to discuss the extraction well replacement effort and storm water permitting issues.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis began the data validation process for the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- J.D. Purvis has been named as the new General Manager of BASF's Wyandotte Site as of August 1. He succeeds former General Manager K. Edward Nuernberg who retired July 31.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #172 to the USEPA on July 1, 2008.
- On July 14, BASF submitted the draft "Phase II Sediment Investigation: Core Collection and Analysis Work Plan" to USEPA and MDEQ for comment.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

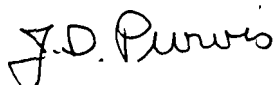
- Arcadis will evaluate the laboratory reports from the June groundwater sampling event.
- BASF/Arcadis will receive and respond to comments for the draft sediment work plan. The final work plan will be delivered following any additional discussions with USEPA and MDEQ that are needed.
- Construction will begin in August on the Outfall 003 box sewer upgrade project and will continue for approximately two months. Sealed HDPE piping will be placed inside the brick sewer to isolate storm and non-contact cooling water from the historical structure.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



J.D. Purvis
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date August 11, 2008
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From K. Edward Nuernberg
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0416

July 1, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 172
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 172 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2008. Please find attached CMS Monthly Progress Report Number 121.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

CMS MONTHLY PROGRESS REPORT NO. 121

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	June 1 through June 30, 2008
Date of Report:	July 1, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis conducted the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.
- On June 4, BASF submitted a request to USEPA to extend the response period to their March 28th and May 14th letters. The extension was approved by e-mail on June 17. BASF's letter outlined the content and schedule for the Sediment Work Plan, with a draft due date of July 14th. USEPA, MDEQ, and BASF will meet the following week to finalize the work scope.

1b. Summary of Changes Made to the CMS

- No changes were made during June.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- None.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis conducted the final background groundwater quality sampling event. The validated groundwater testing results will be provided when available.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #171 to the USEPA on June 10, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will evaluate the laboratory reports from the June 2008 groundwater sampling event.
- BASF/Arcadis will submit the draft sediment work plan on July 14th and will attend a discussion/working meeting with USEPA and MDEQ in Chicago on July 24th (tentative).

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0409

June 10, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 171
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 171 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2008. Please find attached CMS Monthly Progress Report Number 120.

Should you need additional information, please contact us at your convenience.

Sincerely,


K. Edward Nuernberg

Attachment

cc: L. Aubuchon - MDEQ Warren
J. Cashin - Bacon Memorial Public Library
A. Merry - Schlumberger
M. Gerdenich - BASF
J. Lanigan - Jack Lanigan Corp.

R. Conforti - MDEQ-WHMD
M. Erickson - Arcadis
R. Ellis - ENSR
B. Diepeveen - BASF

CMS MONTHLY PROGRESS REPORT NO. 120

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	May 1 through May 30, 2008
Date of Report:	June 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Arcadis reviewed the laboratory results from the third of four planned background well groundwater sampling events and evaluating the same in context with the existing data set. The validated groundwater testing results are included with this progress report.
- BASF, USEPA, and MDEQ participated in conference calls on May 15, 22, and 29 to discuss the March 28th USEPA letter that proposed additional sediment investigation of the Detroit River.

1b. Summary of Changes Made to the CMS

- No changes were made during May.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- BASF contacted Beth Vens of the MDEQ on May 30 regarding replacement of one of the "A" Field groundwater extraction wells. USEPA was copied on this communication. The North Works extraction wells are operated by BASF under the 1986 Consent Decree with the State of Michigan. Well E2NA will be relocated approximately 125 feet east of its present location due to construction activities in the area.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- The validated third round background groundwater testing results are included with this progress report.

**Monthly Progress Report
June 10, 2008**

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report #170 to the USEPA on May 8, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will prepare for and conduct the final round of background groundwater sampling in June.
- Arcadis will continue background data evaluation and preparation of the draft CMS report.
- BASF will submit its request for extension of the response period for the Sediment Characterization Work Plan as agreed to during the May 29th teleconference with USEPA, and MDEQ. The target date of the submittal is June 2. The request will include a description of the approach to be used in developing the Work Plan. Work Plan compilation will commence on approval by USEPA of the conceptual approach.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager

Analytical Results from November 2007 through March 2008 Background Groundwater Sampling

[illegible]

1. All models imported in pp1, except survey, reported in pp1.
2. J = address of value.
3. B = estimated mean profit is less than the JL.
4. U = variable was sampled but not delivered.
5. R = variable is null.
6. NA = Not a number.



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date June 10, 2008
Pages 1 of 5
Subject EPA Monthly Progress Report
cc

From K. Edward Nuernberg
Fax (734) 324-6775
Phone (734) 324-6161

Comments:

Hard Copy to Follow.



The Chemical Company

Helping Make
Products Better™

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0393**

May 8, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 170
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 170 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2008. Please find attached CMS Monthly Progress Report Number 119.

Should you need additional information, please contact us at your convenience.

Sincerely,


K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 119

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	April 1 through April 30, 2008
Date of Report:	May 8, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis reviewed the laboratory results from the third of four planned background well groundwater sampling events and evaluating the same in context with the existing data set. The validated groundwater testing results will be provided to USEPA with the next progress report.
- BASF and USEPA discussed the March 28th USEPA letter that proposed additional activities in the Detroit River. BASF, USEPA, and MDEQ have scheduled a conference call for May 15th to discuss this letter.

1b. Summary of Changes Made to the CMS

- No changes were made during April.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis completed the third of four planned background well groundwater sampling events during March. The groundwater testing results were submitted to the testing laboratory for analysis and the results are now being validated. The validated results will be provided to USEPA with the next progress report.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #169 to the USEPA on April 10, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

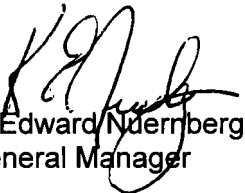
- Arcadis will complete data validation efforts of the March groundwater testing results.
- Arcadis will continue data evaluation and preparation of the draft CMS report.
- BASF, USEPA, and MDEQ will discuss the March 28th letter and the overall CMS project in a conference call scheduled for May 15th at 3:30 EDT.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0386**

April 10, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 169
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 169 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2008. Please find attached CMS Monthly Progress Report Number 118.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

cc: L. Aubuchon – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
A. Merry – Schlumberger
M. Gerdenich – BASF
J. Lanigan – Jack Lanigan Corp.

R. Conforti – MDEQ-WHMD
M. Erickson – Arcadis
R. Ellis – ENSR
B. Diepeveen – BASF



CMS MONTHLY PROGRESS REPORT NO. 118

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	March 1 through March 31, 2008
Date of Report:	April 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis completed the third of four planned background well groundwater sampling events. The groundwater samples were submitted to the testing laboratory for analysis and the validated results will be provided to US EPA when available.

1b. Summary of Changes Made to the CMS

- On March 28 USEPA e-mailed BASF a request for additional sediment sampling off of the North Works property. BASF is reviewing the request in context with the CMS process and will respond in April.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis completed the third of four planned background well groundwater sampling events during March. The groundwater samples were submitted to the testing laboratory for analysis and the validated results will be provided to US EPA when available, anticipated in early May.



1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #168 to the USEPA on March 10, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work


- Arcadis will review the groundwater testing results from the March groundwater sampling event.
- Arcadis will continue preparation of the draft CMS report.
- BASF will contact USEPA regarding its March 28th letter requesting additional sediment sampling.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0609 0379

March 10, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 168
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 168 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2008. Please find attached CMS Monthly Progress Report Number 117.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

CMS MONTHLY PROGRESS REPORT NO. 117

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	February 1 through February 29, 2008
Date of Report:	March 10, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis evaluated the existing North Works data set and the draft Tier II Risk Evaluation Summary Report as part of the CMS report preparation.

1b. Summary of Changes Made to the CMS

- No changes to the CMS work scope were made or proposed during the reporting period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- No sampling occurred during the reporting period. Geotechnical (non-CMS) soil test borings were completed at SWMU-G. The borings are part of the site evaluation process pertaining to possible construction in the vicinity.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #167 to the USEPA on February 8, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- Arcadis will complete the third background well groundwater sampling event during March.
- The next RCRA CMS update meeting was tentatively scheduled for March 2008 however the actual date and time will be determined following input from USEPA.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **March 10, 2008**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9595**

February 8, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

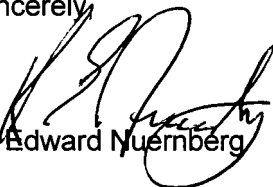
Subject: Monthly Progress Report Number 167
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 167 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2008. Please find attached CMS Monthly Progress Report Number 116.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	R. Ellis -- ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel: (734) 324-6161
www.basf.com/usa

BASF Corporation
Wyandotte, Michigan
North Works

Table 1 - Analytical Results from November 2007 Background Groundwater Sampling

Location ID	BG-MW-1	BG-MW-2	BG-MW-3	BG-MW-4D	BG-MW-6S	BG-MW-7	P35NR	QAQC	QAQC	RFL-MW24	RFL-MW28	WH3-3S	WH3-1S	WH3-3S	WH3-3S
Sample ID	BG-MW-1-1107	BG-MW-2-1107	BG-MW-3-1107	BG-MW-4D-1107	BG-MW-6S-1107	BG-MW-7-1107	P35NR-1107	MW-DUPE-1	MW-DUPE-2	RFL-MW-24-1107	RFL-MW-28-1107	WH3-3S-1107	WH3-1S-1107	WH3-3S	WH3-3S-1107
Sample Date	11/29/2007	11/30/2007	11/29/2007	11/29/2007	11/29/2007	11/29/2007	11/29/2007	11/29/2007	11/30/2007	11/29/2007	11/29/2007	11/29/2007	11/30/2007	11/29/2007	11/29/2007
Antimony	< 60	< 60	< 60 U	< 60	< 60	< 60 U	< 60	< 60	< 60	< 60	18.5 J	< 60	< 60	< 60	< 60
Arsenic	< 10	3.3 J	< 10 U	< 10	< 10	< 10 U	< 10	< 10	< 10	< 10	30.5	52	< 10	< 10	< 10
Barium	12.9 J	294	58.9 J	24.4 J	95.6 J	65.3 J	85.3 J	56.1 J	136 J	32.2 J	39.1 J	47.7 J	140 J	239	85.3 J
Beryllium	< 5	< 5	< 5 U	< 5	< 5	< 5 U	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5
Cadmium	< 5	< 5	< 5 U	< 5	< 5	< 5 U	< 5	< 5	< 5	< 5	1 J	.86 J	< 5	< 5	< 5
Chromium	< 10 U	4.4 J	< 10 U	< 10	< 10	< 10 U	21.4	< 10	< 10	410	21.7	< 10	< 10 U	< 10	< 10
Cobalt	< 50	6.1 J	< 50 U	< 50	< 50	< 50 U	< 50	< 50	< 50	4.1 J	< 50	2.7 J	< 50	< 50	< 50
Copper	< 25	< 25	< 25 U	< 25	4.6 J	< 25 U	< 25	< 25	< 25	14.2 J	< 25	5.7 J	< 25	< 25	< 25
Lead	< 3	< 3	< 3 U	< 3	< 3	< 3 U	< 3	< 3	< 3	< 3	3	< 3	< 3	< 3	< 3
Mercury	0.0022	0.0093	0.0005	0.0006	0.001	0.00069	0.0011	.00023 J	0.0182	0.0014	0.0015	0.001	0.0196	0.00071	0.0028
Nickel	8.3 J	8.3 J	< 40 U	8.2 J	< 40	< 40 U	24.9 J	< 40	< 40	267	19.3 J	6.5 J	< 40	< 40	< 40
Selenium	< 5	< 5	4.9 J	< 5	< 5	< 5 U	< 5	< 5	6.1	< 5	< 5	< 5	7.1	< 5	< 5
Silver	< 10	< 10	< 10 U	< 10	< 10	< 10 U	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10
Thallium	< 10 U	< 10 U	< 10 U	< 10 U	< 10	< 10 U	< 10 U	< 10 U	< 10	< 10 U	< 10 U	< 10 U	< 10	< 10 U	< 10 U
Tin	< 100	< 100	< 100 U	< 100	< 100	< 100 U	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100	< 100
Vanadium	< 50	< 50	< 50 U	< 50	< 50	< 50 U	< 50	< 50	1.6 J	4.4 J	3.5 J	1.1 J	3.6 J	< 50	.92 J
Zinc	< 20	7.9 J	5.1 J	27.2	5.1 J	11.8 J	11.1 J	< 20	< 20	17 J	37.7	13.8 J	10.7 J	5.5 J	21.3

Notes

- 1 All results reported in µg/L.
- 2 J = estimated value
- 3 U = Analyte was analyzed for but not detected

CMS MONTHLY PROGRESS REPORT NO. 116

Project: Corrective Measures Study
for the BASF Wyandotte North Works

Facility: 1609 Biddle Avenue
Wyandotte, Michigan 48192

BASF Project Coordinator: Michael Gerdenich

Arcadis BBL Project Manager: Michael Erickson

Reporting Period: January 1 through January 31, 2008

Date of Report: February 8, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis received and validated the November 2007 background well groundwater data set.
- BASF submitted ENSR's Tier II Risk Evaluation Summary Report to USEPA and the Michigan DEQ on January 31, 2008.

1b. Summary of Changes Made to the CMS

- No changes to the CMS work scope were made or proposed during the reporting period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- No sampling occurred during the reporting period. The results from the November 2007 groundwater sampling event are attached with this report.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #166 to the USEPA on January 9, 2008.
- BASF submitted ENSR's Tier II Risk Evaluation Summary Report to USEPA and the Michigan DEQ on January 31, 2008.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

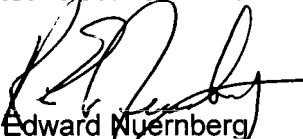
- The next RCRA CMS update meeting has been tentatively scheduled for March 2008 at a time and location to be determined.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **February 8, 2008**
Pages **1 of 5**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.

MID 064 197 742



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9588

January 9, 2008

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 166
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 166 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2007. Please find attached CMS Monthly Progress Report Number 115.

Should you need additional information, please contact us at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward Nuernberg", written over the typed name.

K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 115

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	December 1 through December 31, 2007
Date of Report:	January 9, 2008

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR submitted revised draft ENSR Tier II Risk Evaluation Summary Report. The revised draft will be submitted to US EPA and Michigan DEQ on completion of internal review.
- ENSR, Arcadis BBL, and BASF completed transfer of the project database and files to Arcadis BBL.
- Representatives from BASF (M. Gerdenich, B. Diepeveen) and Arcadis BBL (M. Erickson, L. Tomlinson), the US EPA (J. Thomas, D. Petrovski), and MDEQ (R. Conforti, A. Ostaszewsk) participated in the December 5th RCRA CMS conference call. Topics covered included discussion of the MDEQ/US EPA sediment data from cores collected on August 15th and August 16th, an update of deliverables status and schedule for the CMS, and the replacement of ENSR by Arcadis as BASF's lead RCRA CMS consultant. A RCRA CMS update meeting will be scheduled for March 2008.

1b. Summary of Changes Made to the CMS

- No changes to the CMS work scope were made or proposed during the reporting period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- No sampling occurred during the reporting period.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- No key personnel changes occurred during the reporting period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #165 to the US EPA on December 10, 2007.
- BASF submitted the December 5, 2007 call summary to US EPA and Michigan DEQ on December 31, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- The next RCRA CMS update meeting will be held during March 2008 at a time and location to be determined. Arcadis will validate the laboratory results from the November 2007 groundwater sampling event on receipt from the testing laboratory. The results will be submitted to US EPA and Michigan DEQ following validation.
- BASF will submit the draft Tier II report to US EPA on completion of the internal review.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager



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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9571

December 6, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 165
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 165 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2007. Please find attached CMS Monthly Progress Report Number 114.

Should you need additional information, please contact us at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to be "K. Nuernberg", written over a horizontal line.

K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis BBL
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

CMS MONTHLY PROGRESS REPORT NO. 114

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	November 1 through November 30, 2007
Date of Report:	December 10, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- ENSR, Arcadis BBL, and BASF continued review of the draft ENSR Tier II Risk Evaluation Summary Report; the anticipated completion date is December 2007. The revised draft will be submitted to US EPA and Michigan DEQ on completion.
- ENSR, Arcadis BBL, and BASF completed transfer of the project database and files to Arcadis BBL.

1b. Summary of Changes Made to the CMS

- No changes to the CMS work scope were made or proposed during the reporting period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis BBL completed collection of groundwater samples and groundwater elevation measurements from the background monitoring wells on November 26 to November 30. The samples have been submitted for analysis at TestAmerica Laboratories, Inc.

Monthly Progress Report
December 10, 2007

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- Please note that as of November 2007, Arcadis BBL will be BASF's lead consultant for the RCRA CMS process, with Michael Erickson the Arcadis BBL Project Manager. Arcadis BBL already was a BASF RCRA CMS team member. ENSR will remain on BASF's RCRA CMS team in a support role and is responsible for completion of the Tier II Risk Evaluation report that is currently in revision.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #164 to the US EPA on November 8, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- The next RCRA CMS conference call is tentatively scheduled for December 5, 2007, at 3:00 EST (2:00 CST). Agenda items will include discussion of the MDEQ/US EPA sediment data from cores collected on August 15th and August 16th and a draft Tier II Risk Evaluation Summary Report update.
- ENSR will complete revision of the Tier II Risk Evaluation report. BASF will submit the draft to US EPA on completion.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date December 6, 2007
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From K. Edward Nuernberg
Fax (734) 324-6775
Phone (734) 324-6161

6-6010

Comments:

Hard Copy to Follow.



The Chemical Company

Helping Make
Products Better™

K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9564

November 9, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

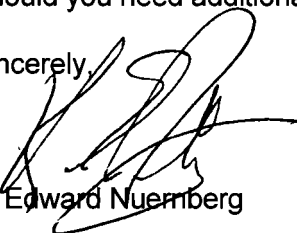
Subject: Monthly Progress Report Number 164
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 164 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2007. Please find attached CMS Monthly Progress Report Number 113.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis BBL
	A. Merry – Schlumberger	R. Ellis -- ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

CMS MONTHLY PROGRESS REPORT NO. 113

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	October 1 through October 31, 2007
Date of Report:	November 9, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR began the data validation process for the August 2007 sampling event for inclusion in next month's progress report.
- Representatives from BASF (M. Gerdenich, B. Diepeveen) and Arcadis BBL (M. Erickson, L. Tomlinson), the US EPA (J. Thomas, D. Petrovski, G. Hamper, J. Dodge, D. Wethington), and MDEQ (R. Conforti, A. Ostaszewski) participated in the October 11th RCRA CMS conference call. Topics covered included discussion of the MDEQ/US EPA sediment data from cores collected on August 15th and August 16th and an update of deliverables status and schedule for the CMS (below). The next RCRA CMS conference call is tentatively scheduled for November 29, 2007, at 10:30 EST (9:30 CST).
- BASF initiated an external review of the draft ENSR Tier II Risk Evaluation Summary Report. The review will be complete in early November and the revised draft will be submitted to US EPA and Michigan DEQ before the next update call.

1b. Summary of Changes Made to the CMS

During the October 2007 conference call, US EPA personnel requested that BASF submit a clarification to the CMS Milestone Schedule. The schedule for submittal of the draft CMS Report for agency review is the second quarter of 2008 (anticipated May 2008). This date is contingent upon agreement regarding the adequacy of the existing sediment data by BASF and US EPA during December 2007.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling occurred during the reporting period.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #163 to the US EPA on October 10, 2007.
- BASF is submitting a revised RCRA CMS timeline with this progress report

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- The next RCRA CMS conference call is tentatively scheduled for November 29, 2007, at 10:30 EST (11:30 CST). Agenda items will include discussion of the MDEQ/US EPA sediment data from cores collected on August 15th and August 16th and the draft Tier II Risk Evaluation Summary Report.
- BASF will complete the internal/external review of the ENSR Tier II Risk Evaluation report and submit the draft to US EPA.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager

Oct. 10. 2007 11:25AM

No. 0384 P. 4



The Chemical Company

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General ManagerCERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9540

October 10, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604Subject: Monthly Progress Report Number 163
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 163 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2007. Please find attached CMS Monthly Progress Report Number 112.

Should you need additional information, please contact us at your convenience.

Sincerely,


K. Edward Nuernberg

Attachment

cc: L. Aubuchon - MDEQ Warren
J. Cashin - Bacon Memorial Public Library
A. Merry - Schlumberger
M. Gerdenich - BASF
J. Lanigan - Jack Lanigan Corp.R. Conforti - MDEQ-WHMD
M. Erickson - Arcadis BBL
R. Ellis - ENSR
B. Diepeveen - BASF

CMS MONTHLY PROGRESS REPORT NO. 112

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	September 1 through September 30, 2007
Date of Report:	October 10, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Arcadis BBL completed its Sediment Probing Study report. The document presents the findings of the sediment probing efforts in the Trenton Channel conducted during the week of August 27th. Thickness measurements were completed along 29 transects using a metal probe and multiple ponar (grab) samples and six vibracore samples were collected to examine the sediment types present.
- ENSR completed its draft Tier II Risk Evaluation Summary Report. The draft is under review by BASF and will be submitted to US EPA and Michigan DEQ during October.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling occurred during the reporting period. The validated May 2007 groundwater sampling data set is being forwarded electronically to US EPA and Michigan DEQ, as are the soil test boring and well construction logs from the August 2007 background well installation program.

Oct. 10. 2007 11:25AM

No. 0384 P. 6

**Monthly Progress Report
October 10, 2007****1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report, #162 to the US EPA on September 6, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**3a. Anticipated Work**

- The next RCRA CMS conference call is tentatively scheduled for October 11, 2007, at 10:30 CDT (11:30 EDT). Agenda items will include discussion of the September 2007 sediment probing report and data provided by the Michigan DEQ from its August 2007 sediment coring effort.
- BASF will complete its review of the ENSR Tier II Risk Evaluation report and submit the draft to US EPA.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION
K. Edward Nuernberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9533

September 6, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 162
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 162 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2007. Please find attached CMS Monthly Progress Report Number 111.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis BBL
	A. Merry – Schlumberger	R. Ellis -- ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	

CMS MONTHLY PROGRESS REPORT NO. 111

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	August 1 through August 31, 2007
Date of Report:	September 6, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Representatives from BASF (M. Gerdenich, R. Ellis (ENSR) and M. Erickson (Arcadis BBL), the US EPA (J. Thomas, D. Petrovski), and MDEQ (R. Conforti, A. Ostaszewski, D. Slayton) participated in the August 23rd RCRA CMS conference call. Topics covered included discussion of the MDEQ/US EPA sediment coring efforts on August 15th and August 16th, a final discussion of the BASF Sediment Probing Work Plan and an update of the supplemental background assessment. The next RCRA CMS conference call is tentatively scheduled for September 27, 2007, at 10:30 EDT (9:30 CDT).
- ENSR completed installation of the remaining off site background monitoring wells and piezometers on the North Works property as part of the groundwater flow model update efforts. This work was conducted August 1st through August 3rd. ENSR personnel collected groundwater samples from the new and existing background wells, and measured groundwater depths in the wells and the new piezometers on August 29th through August 31st. ENSR will complete sediment boring logs and validation of the May 2007 groundwater sampling event for inclusion in next month's progress report. The results of the August sampling effort will be provided when available.
- The MDEQ/US EPA collected sediment cores in the Trenton Channel off of the North Works site on August 15th and 16th. The samples were submitted to the MDEQ laboratory analysis and the verified laboratory results are expected to be made available in September.
- Arcadis BBL conducted its sediment probing effort in the Trenton Channel the week of August 27th. Thickness measurements were completed along 29 transects using a metal probe and multiple ponar (grab) samples and six vibracore samples were collected to examine the sediment types present. Data summaries were provided to MDEQ and US EPA as the work progressed and the summary report will be submitted in September. The efforts were observed by R. Conforte and A. Ostaszewski (MDEQ) on August 28th and R. Conforte (MDEQ) and J. Thomas (US EPA) on August 29th.

- ENSR continued preparation of the draft Tier II Risk Evaluation Summary Report. The draft will be submitted to US EPA and MDEQ during September.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling occurred during the reporting period.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #161 to the US EPA on August 9, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- ENSR will evaluate the groundwater chemical and elevation data as it becomes available.
- ENSR will complete sediment boring logs and its validation of the May 2007 groundwater sampling event for inclusion in next month's progress report.
- MDEQ will provide the laboratory results from their sediment cores when available in September.
- Arcadis BBL will evaluate the sediment probing data and prepare the summary report. The report will be submitted to US EPA and MDEQ as soon as possible in September.

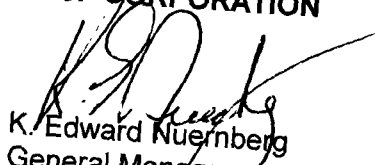
•

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9526**

August 9, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

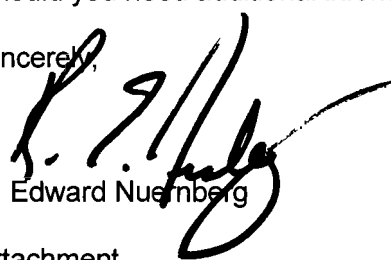
Subject: Monthly Progress Report Number 161
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 161 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2007. Please find attached CMS Monthly Progress Report Number 110.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

cc: Larry Aubuchon – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Richard Conforti – MDEQ-WHMD
Michael Erickson – Arcadis BBL
Randy Ellis -- ENSR
Brian Diepeveen – BASF

CMS MONTHLY PROGRESS REPORT NO. 110

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	July 1 through June 31, 2007
Date of Report:	August 9, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF's request to install groundwater monitoring wells along City right-of-way was approved by the City of Wyandotte engineering department on July 6th and by City Council on July 16th. City engineering approved the well locations on July 27th and the work commenced on July 30th. ENSR shifted some of the well locations due to subsurface conditions encountered during the effort. Soil boring/well logs will be provided with next month's update.
- Representatives from BASF (M. Gerdenich, R. Ellis (ENSR) and M. Erickson (Arcadis BBL), the US EPA (J. Thomas, D. Petrovski, G. Hamper, D. Wethington), and MDEQ (R. Conforti, and D. Slayton) participated in the July 24th RCRA CMS conference call. Topics covered included discussion of the draft Sediment Probing Work Plan and the supplemental background assessment. The next scheduled RCRA CMS conference call is tentatively scheduled for August 23, 2007, at 11:30 EDT (10:30 CDT).
- BASF, US EPA and MDEQ reached general agreement to the sediment probing effort during the call and US EPA approved the work scope by e-mail on July 26th. US EPA attached a draft approval letter to the same e-mail and BASF provided its comments on July 27th regarding the US EPA's anticipated schedule for conducting the work during the week of August 13th. The boat and other equipment necessary to complete the Trenton Channel probing work scope are available the week of August 27th and BASF's consultant Arcadis BBL has committed to conducting the sediment probing effort that week.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.
- The City of Wyandotte was contacted in connection with BASF's request to install groundwater monitoring wells west of the site.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling occurred during the reporting period.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #160 to the US EPA on July 3, 2007.
- BASF submitted the revised draft document titled Discussion Draft – Sediment Probing Study Data Quality Objectives and Work Scope on July 13th.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- ENSR will complete the remaining background monitoring wells the week of August 1st. ENSR also will install piezometers on the North Works property as part of the groundwater flow model update efforts. ENSR will collect groundwater samples from the new wells the week of August 27th.
- ENSR will complete sediment boring logs and its validation of the May 2007 groundwater sampling event for inclusion in next month's progress report.
- On August 15-16, MDEQ will attempt to collect sediment cores in the Trenton Channel off of the North Works site.
- Arcadis BBL will conduct its sediment probing effort in the Trenton Channel the week of August 27th.

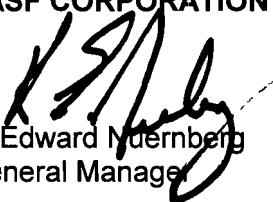
-

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9519**

July 3, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604


Subject: Monthly Progress Report Number 160
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 160 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2007. Please find attached CMS Monthly Progress Report Number 109.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

cc: Larry Aubuchon – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Richard Conforti – MDEQ-WHMD
Michael Erickson – Arcadis BBL
Randy Ellis -- ENSR
Brian Diepeveen – BASF

CMS MONTHLY PROGRESS REPORT NO. 109

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	June 1 through June 30, 2007
Date of Report:	July 3, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR continued preparation of the draft Tier II Human Health and SLERA reports.
- BASF submitted to the City of Wyandotte a request to install groundwater monitoring wells along City right-of-way as part of the supplemental background assessment.
- Representatives from BASF (M. Gerdenich, R. Ellis (ENSR) and M. Erickson (Arcadis BBL), the US EPA (J. Thomas, D. Petrovski, G. Hamper, D. Wethington), and MDEQ (R. Conforti, and D. Slayton) were participants in the June 29th RCRA CMS conference call. Topics covered included discussion of the draft Sediment Probing Work Plan, an update of the supplemental background assessment, the Tier II and SLERA efforts, and other project matters. The next scheduled RCRA CMS conference call will be August 9, 2007, at 10:30 EDT.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.
- Representatives from the MDEQ-WHMD (D. Montgomery, R. Conforti, S. Buda, A. Ostaszewski, and D. Slayton) participated in an orientation tour of the North Works site on June 20th. The orientation included a boat tour of the North Works shoreline and the Detroit River upstream of the site, followed by a land tour of the property.
- The City of Wyandotte was contacted in connection with BASF's request to install groundwater monitoring wells west of the site.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling occurred during the reporting period.

1f. Groundwater Modeling Activities and Summary of Findings

Schlumberger continued its update of the North Works site groundwater model.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #159 to the US EPA on June 6, 2007.
- BASF submitted the draft document titled Discussion Draft – Sediment Probing Work Plan on June 19th.
- BASF submitted Arcadis BBL's Review of Sedimentation Conditions in the Trenton Channel near BASF North Works (November 2006) to MDEQ-WHMD. The document, originally submitted to US EPA and MDEQ-RRD, summarizes available information regarding sediment conditions upstream of and along the North Works site.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF and its consultants will modify the draft Sediment Probing Work Plan to reflect the June 29th discussion with US EPA and MDEQ-WHMD personnel. The revised document will be distributed on July 13th.
- BASF and its consultants will work with the City of Wyandotte to identify suitable locations for the background groundwater monitoring wells and prepare the final version of the Supplemental Background Assessment Work Plan.
- ENSR personnel will validate the preliminary data as received from the testing laboratory.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager

CMS MONTHLY PROGRESS REPORT NO. 114

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
BASF Project Coordinator:	Michael Gerdenich
Arcadis BBL Project Manager:	Michael Erickson
Reporting Period:	November 1 through November 30, 2007
Date of Report:	December 10, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR, Arcadis BBL, and BASF continued review of the draft ENSR Tier II Risk Evaluation Summary Report; the anticipated completion date is December 2007. The revised draft will be submitted to US EPA and Michigan DEQ on completion.
- ENSR, Arcadis BBL, and BASF completed transfer of the project database and files to Arcadis BBL.

1b. Summary of Changes Made to the CMS

- No changes to the CMS work scope were made or proposed during the reporting period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

- No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

- No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

- Arcadis BBL completed collection of groundwater samples and groundwater elevation measurements from the background monitoring wells on November 26 to November 30. The samples have been submitted for analysis at TestAmerica Laboratories, Inc.

1f. Groundwater Modeling Activities and Summary of Findings

- No groundwater modeling occurred during the reporting period.

1g. Key Project Personnel Changes

- Please note that as of November 2007, Arcadis BBL will be BASF's lead consultant for the RCRA CMS process, with Michael Erickson the Arcadis BBL Project Manager. Arcadis BBL already was a BASF RCRA CMS team member. ENSR will remain on BASF's RCRA CMS team in a support role and is responsible for completion of the Tier II Risk Evaluation report that is currently in revision.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

- BASF submitted Monthly Progress Report. #164 to the US EPA on November 8, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- The next RCRA CMS conference call is tentatively scheduled for December 5, 2007, at 3:00 EST (2:00 CST). Agenda items will include discussion of the MDEQ/US EPA sediment data from cores collected on August 15th and August 16th and a draft Tier II Risk Evaluation Summary Report update.
- ENSR will complete revision of the Tier II Risk Evaluation report. BASF will submit the draft to US EPA on completion.

3b. Anticipated Problems and Proposed Resolutions

- No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager

MID 064 197 742



The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9571

December 6, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 165
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 165 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2007. Please find attached CMS Monthly Progress Report Number 114.

Should you need additional information, please contact us at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to be "K. Nuernberg", written over the printed name.

K. Edward Nuernberg

Attachment

cc:	L. Aubuchon – MDEQ Warren	R. Conforti – MDEQ-WHMD
	J. Cashin – Bacon Memorial Public Library	M. Erickson – Arcadis BBL
	A. Merry – Schlumberger	R. Ellis – ENSR
	M. Gerdenich – BASF	B. Diepeveen – BASF
	J. Lanigan – Jack Lanigan Corp.	



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9502**

June 6, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 159
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 159 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2007. Please find attached CMS Monthly Progress Report Number 108.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

i:\ecology\RCRA CA\EPA Progress Reports\PROGRES159

cc: Larry Aubuchon – MDEQ Warren
Richard Conforti – MDEQ-WHMD
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Rhonda Blayer – MDEQ Lansing
J. Cashin – Bacon Memorial Public Library
Randy Ellis – ENSR
Brian Diepeveen – BASF
Michael Erickson – Arcadis BBL

CMS MONTHLY PROGRESS REPORT NO. 108

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	May 1 through May 31, 2007
Date of Report:	June 4, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR continued preparation of the draft Tier II Human Health and SLERA reports. On May 2, additional surface soil samples were collected from SWMUs F and H, and AOC-6 as part of the Tier II risk assessment.
- ENSR completed the 4th round of groundwater sampling of the background and GSI wells from May 2 through May 9.
- Representatives from BASF (B. Diepeveen, M. Gerdenich, D. Sheaves R. Ellis (ENSR) and M.I Erickson (Arcadis BBL), the US EPA (J. Thomas, D. Petrovski, G. Hamper, D. Wethington), and MDEQ (R. Conforti, A. Ostaszewski, V. Hemmock, and D. Slayton) were participants in the May 17th RCRA CMS conference call. Topics covered included the draft Supplemental Background Assessment Work Plan, potential impacts to the RCRA CMS from the ongoing plant expansion, the EPA's request for sediment probing in the Trenton Channel off of North Works, and a general project update. BASF is preparing a teleconference summary that will be distributed to the participants the week of June 4th. The next scheduled RCRA CMS conference call will be June 28, 2007, at 10:30 EDT.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

Representatives from the MDEQ participated in the May 17th. BASF's MDEQ contact for RCRA CMS-related matters will now be Rich Conforti with MDEQ-WHMD.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

Between May 2 and May 9, 2007, ENSR conducted the 4th round of groundwater sampling at the eight background and 26 GSI monitoring wells originally agreed to by EPA in August 2006.

On May 9, 2007, ENSR personnel collected a total of 30 surface soil samples to support the Tier 2 risk assessment. A total of 10 surface soil samples were collected from each of the SWMU F, SWMU H and AOC 6 areas and submitted for chemical analysis.

1f. Groundwater Modeling Activities and Summary of Findings

Schlumberger continued its update of the North Works site groundwater model.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF submitted Monthly Progress Report. #158 to the US EPA on May 4, 2007.

BASF submitted the draft document titled Supplemental Background Assessment Work Plan on May 15th

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

BASF and its consultant team will participate in a teleconference call with US EPA and the MDEQ on June 28th. The agenda will include discussion of the draft sediment Work Plan that BASF will submit prior to the call outlining proposed sediment probing efforts in the Trenton Channel.

BASF will host a North Works tour for MDEQ-WHMD personnel on June 20th, 2007.

ENSR personnel will validate the preliminary data as received from the testing laboratory.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuehnberg
General Manager



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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9496

May 4, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 158
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 158 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2007. Please find attached CMS Monthly Progress Report Number 107.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

i:\ecology\RCRA CA\EPA Progress Reports\PROGRES158

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

De Montgomery – MDEQ-WHMD
J. Cashin – Bacon Memorial Public Library
Randy Ellis – ENSR
Brian Diepeveen – BASF
Michael Erickson – BBL

CMS MONTHLY PROGRESS REPORT NO. 107

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	April 1 through April 30, 2007
Date of Report:	May 4, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Soil removal efforts continued in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works.
- ENSR continued preparation of the draft Tier II Human Health and SLERA reports.
- Representatives from BASF (B. Diepeveen, M. Gerdenich, D. Sheaves and R. Ellis from ENSR), the US EPA (J. Thomas, D. Petrovski, G. Hamper, D. Wethington), and MDEQ (D. Montgomery, A. Ostaszewski, J. Sygo) were participants in the April 5th RCRA CMS conference call. Topics covered included additions to the CMS work scope (background groundwater and soil investigations and sediment deposition study) and the associated impact to the overall CMS schedule. BASF distributed a meeting summary to the participants on April 23rd. The next scheduled RCRA CMS conference call will be May 17th at 3:00 EDT.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

Representatives from the MDEQ participated in the April 5th call. BASF's MDEQ contact for RCRA CMS-related matters will now be De Montgomery with MDEQ-WHMD.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during this period.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

Soil removal efforts continued in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works. The contaminated soil was tested and met the requirements for off site disposal as non-hazardous daily cover material at a Type II landfill. During April, approximately 1,720 yds³ of the contaminated soil were excavated and disposed off site in a Type II landfill. The contaminated soil removal effort was completed on April 3rd, with a total of 6,120 yds³ removed. The excavation was backfilled with clean soil.

On April 17th, BASF notified US EPA that six groundwater monitoring wells (RFI-MW-15, RFI-MW-16, RFI-MW-17, CMS-MW-16, WHI7-1F, and WHI7-2F) would be removed as part of the plant expansion efforts. Since then, three additional wells were added to this list (RFI-MW-21, WHI-7-4P, and WHI-7-4F). The wells were abandoned in place following procedures described in ASTM Standard Method D-5299-92 – *Standard Guide for Decommissioning of Ground Water Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environmental Activities*. None of the wells were considered critical to the ongoing CMS efforts; however some of the wells may be replaced when construction in this area is complete.

1f. Groundwater Modeling Activities and Summary of Findings

Schlumberger continued its update of the North Works site groundwater model.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during this period.

2. 2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF submitted Monthly Progress Report. #157 to the US EPA on April 9th, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

BASF and its consultant team will participate in a teleconference call with US EPA and the MDEQ on May 17th. The agenda will include discussion of a Work Plan draft that BASF will submit prior to the call outlining additional soil and groundwater sampling efforts.

ENSR personnel will validate the preliminary data as received from the testing laboratory.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager



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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9489

April 9, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 157
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 157 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2007. Please find attached CMS Monthly Progress Report Number 106.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

\\ecology\RCRA CA\EPA Progress Reports\Draft PRGRES156.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis – ENSR
Brian Diepeveen – BASF
Michael Erickson – BBL

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 106

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	March 1 through March 31, 2007
Date of Report:	April 5, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

Soil removal efforts began in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works.

ENSR and BASF began evaluation of preliminary results from the February groundwater sampling effort.

ENSR continued preparation of the draft Tier II Human Health and Screening Level Ecological Risk Assessment reports, including holding discussions with US EPA staff to define remaining data gaps.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during February.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

Soil removal efforts began in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works. The contaminated soil has been tested and meets the requirements for off site disposal as non-hazardous daily cover material at a Type II landfill. During March, approximately 4,400 yds³ of the contaminated soil were excavated and disposed off site in a Type II landfill.

1f. Groundwater Modeling Activities and Summary of Findings

Schlumberger Water Services continued its update of the North Works site groundwater model.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during March.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF submitted Monthly Progress Report. #156 to the US EPA on March 2, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

BASF and its consultant team will participate in a teleconference call with US EPA on April 5, 2007. The agenda will include further discussion of issues raised in the March call and the revised CMS schedule.

ENSR personnel will validate the preliminary data as received from the testing laboratory.

Soil removal efforts will continue in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works.

ENSR will incorporate recent data to the draft already submitted into the next draft of the Tier II Risk Evaluation and screening level ecological risk assessments document.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1350 0005 4967 7873**

March 2, 2007

/ Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 156
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 156 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2007. Please find attached CMS Monthly Progress Report Number 105.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

i:\ecology\RCRA CA\EPA Progress Reports\Draft PRGRES156.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen – BASF
Michael Erickson - BBL

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel. (734) 324-6161
www.basf.com/usa

1d. Problems/Issues Encountered and Resolutions

No problems/issues were encountered during February.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

The phase three groundwater-sampling event was completed during February 2007.

1f. Groundwater Modeling Activities and Summary of Findings

Groundwater modeling activities have resumed and ENSR is coordinating with Schlumberger Water Services to complete the groundwater modeling efforts.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during December.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF submitted Monthly Progress Report. #155 to the US EPA on February 12, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

BASF and its consultant team will submit a February 27th meeting summary to US EPA on March 6th and will participate in a teleconference call on March 8th. The agenda will include further discussion of issues raised in Chicago and schedule revisions to the CMS.

ENSR personnel will validate the preliminary data as received from the testing laboratory.

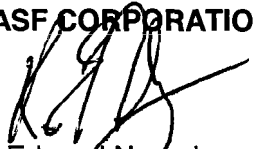
ENSR will incorporate recent data to the draft already submitted into the next draft of the Tier II Risk Evaluation and screening level ecological risk assessments document.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION


K. Edward Nuernberg
General Manager

CMS MONTHLY PROGRESS REPORT NO. 105

Project: Corrective Measures Study
for the BASF Wyandotte North Works

Facility: 1609 Biddle Avenue
Wyandotte, Michigan 48192

Respondent Project Coordinator: Michael Gerdenich, BASF Corporation

ENSR International Project Manager: Randy Ellis

Reporting Period: February 1 through February 28, 2007

Date of Report: March 2, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

BASF and ENSR implemented the third phase of background and GSI well groundwater sampling in February. The analytical laboratory, Severn Trent, will provide ENSR and BASF with preliminary results from the Phase 3 groundwater sampling activities during the next reporting period. ENSR anticipates receiving the data validation report for the Phase three groundwater sampling in April.

Geotechnical testing was conducted in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works.

Schlumberger began revising the North Works site groundwater flow model to reflect data collected after 2002.

BASF and its CMS team (ENSR, Schlumberger Water Services, and BBL) met on February 27th with U.S. EPA Region V personnel at their Chicago Office. The meeting agenda included a review of work completed since April 2006 and ongoing CMS tasks, a discussion of the Wyandotte site expansion projects, the draft Tier II Human Health and Screening Level Ecological Risk Assessment reports, and revisions to the schedule for completion of the CMS. This discussion will be continued in a conference call scheduled for March 8th.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

Representatives of the Michigan DEQ participated in the February 27th meeting via telephone. No contacts with local community representatives or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.



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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9472

February 12, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

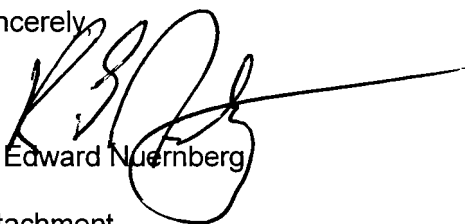
Subject: Monthly Progress Report Number 155
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation is submitting monthly Progress Report No. 155 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2007. Please find attached CMS Monthly Progress Report Number 104.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\RCRA CA\EPA Progress Reports\PRGRES155.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen – BASF
Michael Erickson - BBL

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 104

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	January 1 through January 31, 2007
Date of Report:	February 12, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

The ENSR provided validated Phase 2 groundwater sampling results for samples collected in November 2006. A validated results summary from both the September 2006 and November 2006 sample collection events is included with the hard copy of this month's progress report.

BASF is evaluating preliminary drafts of ENSR submittals including "Tier 2 Risk Evaluation Summary Report for BASF North Works Facility in Wyandotte, Michigan" and "Subsurface Characterization Using Membrane Interface Probe (MIP) and Soil Conductivity (SC) Technologies BASF North Works Wyandotte, MI." BASF and ENSR are evaluating potential corrective measure alternatives as part of the review process.

Geotechnical testing was conducted in and adjacent to AOC-2 as part of the manufacturing facility expansion project underway at North Works. BASF is relocating the R&D, administrative and manufacturing operations of recently acquired Johnson Polymer to Wyandotte.

Work has resumed on the site groundwater flow model update. An estimated 80% of the groundwater modeling portion of the CMS has been completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

BASF has retained Schlumberger Water Services (SWS; formerly Waterloo Hydrogeologic Inc.) to complete the groundwater flow modeling efforts at North Works. As discussed in last month's monthly update report, contractual issues had resulted in this part of the CMS being placed on hold. These issues have been resolved and information from the newly-installed wells is now being integrated into the site groundwater model.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

BASF is forwarding data summaries from the Phase 1 and Phase 2 groundwater sampling events completed in September and November 2006 to US EPA.

Preparations are underway for the Phase 3 groundwater sampling event scheduled for February 2007.

1f. Groundwater Modeling Activities and Summary of Findings

Groundwater modeling activities have resumed and ENSR is coordinating with SWS to complete the groundwater modeling efforts.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during December.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF submitted CMS Monthly Progress Report #154 to the US EPA on January 9, 2007.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

BASF and its RCRA CMS consultant team will meet with US EPA personnel in Chicago on February 27, 2007. Agenda items will include an update regarding the BASF Wyandotte - North Works facilities expansion projects and a discussion of their impacts to the RCRA CMS; an update of activities completed since the April 2006 meeting between US EPA and BASF or currently underway; a presentation of preliminary tier II human health and screening level ecological risk assessment findings; and a discussion of remaining RCRA CMS elements and schedule for completion.

ENSR personnel will complete the Phase 3 groundwater sampling event during February 2007.

ENSR will incorporate recent data and revisions to the draft already submitted into the next draft of the Tier II Risk Evaluation and screening level ecological risk assessments document.

SWS will update the North Works groundwater flow model to reflect data collected at the site since 2002.

3b. Anticipated Problems and Proposed Resolutions

No additions at this time.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 3110 0003 0608 9465**

January 9, 2007

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

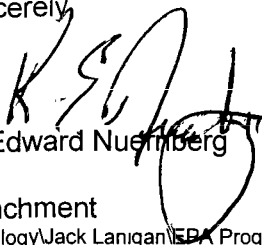
Subject: Monthly Progress Report Number 154
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 154 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2006. Please find attached the CMS Monthly Progress Report Number 103.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES154.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen – BASF

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 103

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager:	Randy Ellis
Reporting Period:	December 1 through December 31, 2006
Date of Report:	January 9, 2007

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

BASF and ENSR continued to evaluate potential corrective measure alternatives.

BASF and ENSR evaluated the Michigan DEQ memorandum discussing mixing zone calculations in the Trenton Channel.

The analytical laboratory provided ENSR with preliminary results from the Phase 2 groundwater sampling activities and the validated data for the Phase 1 groundwater sampling completed in September 2006.

ENSR provided BASF with a first draft of Columbia Technologies report of their findings from the Media Interface Probe work performed in and around the area described as AOC 5. BASF is reviewing this document.

ENSR provided BASF with a first draft of its "Tier 2 Risk Evaluation Summary Report for BASF North Works Facility in Wyandotte, Michigan." BASF is reviewing this document.

The estimated percent completion of the overall CMS cannot be calculated until BASF and EPA agree on the corrective action objectives. However, an estimated 80% of the groundwater modeling portion of the CMS is completed.

BASF conducted limited soil test pitting at the proposed location of a new manufacturing facility set for construction at North Works. BASF is relocating the R&D, administrative and manufacturing operations of recently acquired Johnson Polymer to Wyandotte as part of a major site expansion. Soil samples were collected for chemical analysis during the effort and the laboratory results are scheduled for delivery to BASF in January 2007.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

BASF has been unable to reach a contractual agreement with the responsible contractor, Schlumberger Water Services (formerly Waterloo Hydrogeologic Inc.) to complete the groundwater flow modeling efforts. BASF is in the process of recovering the work product from Schlumberger and retaining a new consultant to complete the effort. This is a significant issue toward completion of the RCRA CMS since this effort will include incorporation of the newly-installed wells into the existing site groundwater model.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

BASF received the validated analytical results for the Phase 1 groundwater sampling and the initial results from the Phase 2 groundwater sampling during December 2006. BASF and ENSR are reviewing the data.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month. As discussed in section 1d, BASF has been unable to reach a contractual agreement with its consultant to complete the groundwater flow modeling efforts. BASF is in the process of recovering the work product from Schlumberger and retaining a new consultant to complete the effort.

1g. Key Project Personnel Changes

No changes to key project personnel occurred during December.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF has received and is reviewing two draft reports that will be included with the CMS report to be submitted to the US EPA. The first, "Subsurface Characterization Using Membrane Interface Probe (MIP) and Soil Conductivity (SC) Technologies BASF North Works Wyandotte, MI," summarizes the recent work at AOC 5. The second is the draft "Tier 2 Risk Evaluation Summary Report for BASF North Works Facility in Wyandotte, Michigan" that was prepared by ENSR.

BASF also submitted CMS Monthly Progress Report. #153 to the US EPA on December 8, 2006.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

ENSR will incorporate recent data into the next draft of the Tier II Risk Evaluation and screening level ecological risk assessments document.

BASF will review the draft reports received in late December 2006. The final documents will be incorporated into the CMS report submitted to the US EPA.

BASF continues to evaluate potential corrective measures and alternatives.

BASF and ENSR expect to receive validated analytical results from the second of four rounds of groundwater sampling activities that were agreed to between BASF and US EPA.

ENSR will begin preparing the draft CMS Report, if possible.

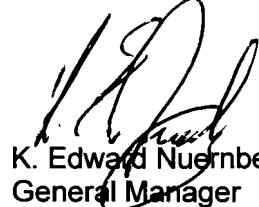
3b. Anticipated Problems and Proposed Resolutions

Due to the influx of additional data from the completed and soon to be conducted groundwater sampling events and the ramification of the pending construction of a new manufacturing facility at North Works, BASF requested an extension of time for submitting the draft CMS Report and is working with US EPA on the schedule.

BASF, ENSR, and US EPA will attend an interim CMS meeting to be held in Chicago, tentatively planned for mid February 2007. The meeting will provide an opportunity to review and discuss the status of the North Works RCRA CMS, consideration of potential CAOs based on the newly acquired data, discussion of the schedule for the data collection efforts previously agreed to by US EPA and BASF, and to discuss the potential impacts to the CMS from the pending expansion in 2007 of the North Works facility. It is BASF's hope that, in the spirit of US EPA's results-based approach to corrective actions, the meeting will provide the parties an opportunity to openly discuss the North Works RCRA CA project and the newly acquired data while minimizing the need for preparation and submittal of multiple interim documents that will ultimately comprise the RCRA CMS report.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4846 7456**

December 8, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 153
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 153 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2006. Please find attached the CMS Monthly Progress Report Number 102.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES153.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Michael Gerdenich – BASF
Jack Lanigan – Jack Lanigan Corp.

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen – BASF

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 102

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Michael Gerdenich, BASF Corporation
ENSR International Project Manager: Schlumberger Project Manager:	Randy Ellis Alge Merry
Reporting Period:	November 1 through November 30, 2006
Date of Report:	December 8, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

BASF and ENSR continued to evaluate potential corrective measure alternatives.

The EPA provided BASF with a copy of a DEQ memorandum discussing mixing zone calculations in the Trenton Channel. BASF is reviewing that memorandum.

BASF and ENSR implemented the second phase of groundwater sampling of background and GSI wells. The sampling event was the second of the four phases agreed upon between the EPA and BASF. The analytical laboratory, Severn Trent, will provide ENSR and BASF with preliminary results from the Phase 2 groundwater sampling activities during the next reporting period. ENSR also anticipates receiving the data validation report for the Phase 1 groundwater sampling during the next period.

ENSR conducted a DNAPL removal/recovery test in AOC 5 as part of the CMS.

ENSR with the aid of Columbia Technologies is preparing a report of their findings from the Media Interface Probe work performed in and around the area described as AOC 5.

BASF received the final draft report that assembled and evaluated data on sediment quantity and quality in the Trenton Channel. This report answers questions raised by EPA in a letter dated June 15, 2006. The report was forwarded to USEPA on November 14, 2006.

The estimated percent completion of the CMS cannot be calculated until BASF and EPA agree on the corrective action objectives.

An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

BASF awaits EPA's resolution of an ongoing discussion with the MDEQ concerning mixing zones in the Detroit River and the applicability of the EI 750 Report.

EPA approval of BASF plans (e.g. background groundwater sampling plan) and subsequent MDEQ disagreement of approach cause potential project delays, repeat of tasks and program inconsistencies. The proposed MDEQ requirements are in direct conflict with EPA program and guidance.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

BASF expects to receive the validated analytical results for the Phase 1 groundwater sampling and the initial results from the Phase 2 groundwater sampling during December 2006.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month. Results from the recent data-collection effort are being shared with Schlumberger Water Services (formerly Waterloo Hydrogeologic Inc.).

1g. Key Project Personnel Changes

No changes to key project personnel occurred during November.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF delivered to USEPA the final draft report titled "Review of Sedimentation Conditions in the Trenton Channel Near BASF North Works" on November 14, 2006. The report, which was prepared for BASF by BBL, Inc., assembled and evaluated data on sediment quantity and quality in the Trenton Channel. This report answers questions raised by EPA in a letter dated June 15, 2006. BASF also submitted CMS Monthly Progress Report. #152 to the USEPA on November 9, 2006.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

ENSR will continue preparation of the Tier II Risk Evaluation and screening level ecological risk assessments.

BASF and ENSR expect to receive a report from Columbia Technologies that describes the topography on the regional clay and the distribution of propylene dichloride within the area described as AOC 5. Once received, we will review the report and incorporate the findings into the corrective measures study.

BASF continues to evaluate potential corrective measures and alternatives.

BASF and ENSR expect to receive validated analytical results from the soils sampling activities and validated analytical results from the first of four rounds of groundwater sampling activities.

ENSR will receive preliminary analytical results from the second phase of groundwater sampling.

BASF and its consultants await formal feedback from EPA on the conceptual groundwater model.

BASF awaits resolution of the mixing zone disagreements between the EPA and the Michigan DEQ.

ENSR will begin preparing the Draft CMS Report, if possible.

3b. Anticipated Problems and Proposed Resolutions

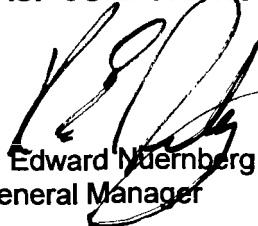
BASF continues to await resolution of matters between the DEQ and EPA concerning the GSI and mixing zone issues. A revised Gantt chart was submitted to USEPA that reflects the scheduling impact due to the delay until August 2006 in receiving approval of the GSI well locations.

BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

BASF waits the USEPA's available dates for a site visit and meeting in Wyandotte. BASF continues to reiterate the need and value of a meeting held at the Wyandotte site. However, until such arrangements can be made, BASF and USEPA have scheduled an interim meeting to be held in Chicago, tentatively in mid February 2007.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4846 7432**

November 9, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

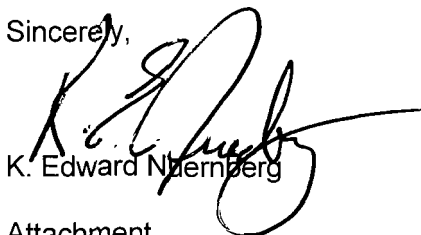
Subject: Monthly Progress Report Number 152
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 152 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2006. Please find attached the CMS Monthly Progress Report Number 101.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES152.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Mike Gerdenich – BASF

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen -- BASF

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 101

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Jack Lanigan, (Interim) BASF Corporation
ENSR International Project Manager: Schlumberger Project Manager:	Randy Ellis Alge Merry
Reporting Period:	October 1 through October 31, 2006
Date of Report:	November 7, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

BASF and ENSR continued to evaluate potential corrective measure alternatives.

The EPA provided BASF with a copy of a DEQ memorandum discussing mixing zone calculations in the Trenton Channel. BASF is reviewing that memorandum.

BASF and ENSR planned the second phase of groundwater sampling from background and GSI. This sampling event will be the second of the four phases agreed upon between the EPA and BASF.

The analytical laboratory, Severn Trent, provided ENSR and BASF with preliminary results from the groundwater sampling activities performed Phase 1. ENSR submitted the results for validation and awaits the report.

ENSR with the aid of Columbia Technologies is preparing a report of their findings from the Media Interface Probe work performed in and around the area described as AOC 5. Urban Engineering performed a precise leveling survey on the probing locations.

BASF received the final report that assembled and evaluated data on sediment quantity and quality in the Trenton Channel. This report answers questions raised by EPA in a letter dated June 15, 2006.

The estimated percent completion of the CMS cannot be calculated until BASF and EPA agree on the corrective action objectives.

An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

BASF awaits EPA's resolution of an ongoing discussion with the DEQ's Water Bureau concerning mixing zones in the Detroit River and the applicability of the EI 750 Report.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

BASF expects to receive the validated analytical results during November for the Phase 1 groundwater sampling.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month. Results from the recent data-collection effort are being shared with Schlumberger Water Services (formerly Waterloo Hydrogeologic Inc.).

1g. Key Project Personnel Changes

BASF Corporation has appointed Mr. Michael J. Gerdenich as the Project Coordinator replacing Mr. Jack Lanigan who served on an interim basis. Mr. Gerdenich may be reached at 734-324-6298. His e-mail address is michael.gerdenich@basf.com.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables or reports were due to the EPA from BASF during the month other than the regular monthly report.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

ENSR continued preparing a Tier II Risk Evaluation and a screening level ecological risk assessment.

BASF and ENSR expect to receive a report from Columbia Technologies that describes the topography on the regional clay and the distribution of propylene dichloride within the area described as AOC 5. Once received, we will review the report and incorporate the findings into the corrective measures study.

BASF will present the EPA with a report evaluating existing sediment and bathymetric data for portions of the Trenton Channel.

BASF continues to evaluate potential corrective measures and alternatives.

BASF and ENSR expect to receive validated analytical results from the soils sampling activities and preliminary analytical results from the first of four rounds of groundwater sampling activities.

ENSR will perform the second phase of groundwater sampling.

BASF and its consultants await formal feedback from EPA on the conceptual groundwater model.

BASF awaits resolution of the mixing zone disagreements between the EPA and the Michigan DEQ.

ENSR will begin preparing the Draft CMS Report, if possible.

3b. Anticipated Problems and Proposed Resolutions

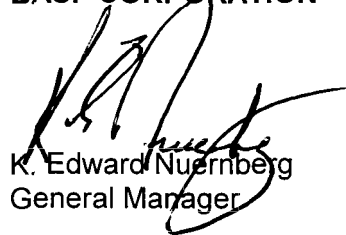
BASF continues to be behind schedule awaiting resolution of issues between the DEQ and EPA concerning the GSI and mixing zone issues.

BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

BASF awaits the EPA's available dates for a site visit and meeting in Wyandotte. EPA has postponed this meeting on several occasions since mid-April.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4846 7425**

October 3, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 151
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 151 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2006. Please find attached the CMS Monthly Progress Report Number 100.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

r:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES151.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – Schlumberger
Jack Lanigan – BASF

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen – BASF

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel: (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 100

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility:	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Jack Lanigan, (Interim) BASF Corporation
ENSR International Project Manager: Schlumberger Project Manager:	Randy Ellis Alge Merry
Reporting Period:	September 1 through September 30, 2006
Date of Report:	October 2, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

BASF and ENSR continued to evaluate potential corrective measure alternatives.

The EPA provided BASF with a copy of a DEQ memorandum discussing mixing zone calculations in the Trenton Channel. BASF is reviewing that memorandum.

Well P-35-N (a background sampling location for groundwater) had an insufficient column of groundwater for sampling. ENSR and Stearns Drilling deepened the well and attempted to sample it.

BASF and ENSR collected samples of groundwater from background and GSI well locations for analysis of mercury by the low-level method. This sampling event was part of the first of four agreed upon between the EPA and BASF.

The analytical laboratory, Severn Trent, provided ENSR and BASF with preliminary results from the groundwater sampling activities performed during August. ENSR submitted the results for validation.

BASF and ENSR completed a soil-probing assessment with the aid of Columbia Technologies and Stearns Drilling Company. The work occurred in and around the area described as AOC 5. It utilized a Media Interface Probe to map the topography on the regional clay and to identify accumulations of propylene dichloride.

BASF continued assembling and evaluating data on sediment quality in the Trenton Channel. BASF reviewed a draft report prepared by our consultant.

The estimated percent completion of the CMS cannot be calculated until BASF and EPA agree on the corrective action objectives.

An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

BASF awaits EPA's resolution of an ongoing discussion with the DEQ's Water Bureau concerning mixing zones in the Detroit River and the applicability of the EI 750 Report.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

ENSR collected samples of groundwater from background and GSI wells during September for analysis of mercury by the low-level method. BASF expects to receive the validated analytical results during November.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month. Results from the recent data-collection effort are being shared with Schlumberger Water Services (formerly Waterloo Hydrogeologic Inc.).

1g. Key Project Personnel Changes

No changes to key personnel occurred during September 2006.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables or reports were due to the EPA from BASF during the month other than the regular monthly report.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

ENSR continued preparing a Tier II Risk Evaluation and a screening level ecological risk assessment.

BASF and ENSR expect to receive a report from Columbia Technologies that describes the topography on the regional clay and the distribution of propylene dichloride within the area described as AOC 5. Once received, we will review the report and incorporate the findings into the corrective measures study.

On behalf of BASF, Blasland, Bouck & Lee, Inc. continued assembling and evaluating existing sediment and bathymetric data for portions of the Trenton Channel. BASF

expects to present the findings and recommendations from this work to the EPA during October.

BASF continues to evaluate potential corrective measures and alternatives.

BASF and ENSR expect to receive validated analytical results from the soils sampling activities and preliminary analytical results from the first of four rounds of groundwater sampling activities.

Another attempt to sample P-35-N will occur. The well has had sufficient time to recharge since being deepened.

BASF and its consultants await formal feedback from EPA on the conceptual groundwater model.

BASF awaits resolution of the mixing zone disagreements between the EPA and the Michigan DEQ.

ENSR will begin preparing the Draft CMS Report, if possible.


3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule awaiting resolution of issues between the DEQ and EPA concerning the GSI and mixing zones.

BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4846 7418**

September 8, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

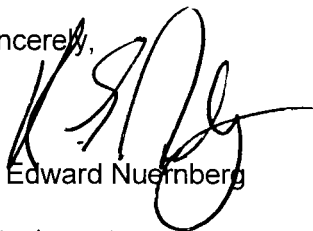
Subject: Monthly Progress Report Number 150
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 150 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2006. Please find attached the CMS Monthly Progress Report Number 99.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES150.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – WHI
Jack Lanigan – BASF

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR
Brian Diepeveen -- BASF

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 99

Project:	Corrective Measures Study for the BASF Wyandotte North Works
Facility	1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Jack Lanigan, (Interim) BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Alge Merry
Reporting Period:	August 1 through August 31, 2006
Date of Report:	September 8, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

At the request of the EPA, BASF prepared a work plan describing the well installation program. BASF presented this plan to the EPA (with copies to the Michigan DEQ) in a document dated August 2, 2006, and the EPA approved that plan in an electronic message on August 10, 2006.

BASF and ENSR continued to evaluate potential corrective measure alternatives.

BASF requested a modification to its proposed groundwater sampling plan. ENSR found a well thought to have been destroyed. This well (#P-35-N) was in a suitable location for sampling background conditions making the planned new well unnecessary. The EPA agreed to this modification.

BASF and ENSR installed 12 new groundwater monitoring wells along the Detroit River shore. BASF and ENSR will use these wells to obtain samples of groundwater for evaluation of the GSI pathway.

BASF and ENSR collected samples of groundwater from approximately 35 locations for chemical analyses. This sampling event was the first of four agreed upon between the EPA and BASF. ENSR will use the analytical results to evaluate the GSI pathway and to calculate statistically valid exposure point concentrations.

The analytical laboratory, Severn Trent, provided ENSR with preliminary results from the soil sampling activities performed during July. ENSR submitted the results for validation.

The estimated percent completion of the CMS cannot be determined until BASF and EPA agree on the corrective action objectives.

BASF continued assembling and evaluating data on sediment quality in the Trenton Channel.

An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

ENSR requested information from the FWS and the Michigan DNR concerning the identity of appropriate species for the screening level ecological risk assessment. No other contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS.

1d. Problems/Issues Encountered and Resolutions

BASF awaits EPA's resolution of an ongoing discussion with the DEQ's Water Bureau concerning mixing zones in the Detroit River and the applicability of the EI 750 Report.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

ENSR collected groundwater elevations across the entire North Works during July. Maps of the groundwater surfaces are in preparation.

ENSR collected samples of soil from approximately 25 locations. The laboratory completed their analyses, and the data are in the validation process. Final results are expected during September.

ENSR collected samples of groundwater from approximately 35 wells during August. BASF expects to receive the validated analytical results during November.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month. Results from the recent data-collection effort will be shared with Waterloo after the data are compiled.

1g. Key Project Personnel Changes

No changes to key personnel occurred during August 2006. Mr. Jack Lanigan continues to serve as BASF Corporation's Project Coordinator on an interim basis.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF presented the EPA with a Well Installation Plan on August 2, 2006. The EPA approved that plan on August 10. No other deliverables or reports were due to the USEPA during the month.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

The first of four quarterly groundwater sampling efforts began in August and will be completed during September.

ENSR continued preparing a Tier II Risk Evaluation and a screening level ecological risk assessment.

BASF and ENSR will begin a soil-probing assessment with the aid of Columbia Technologies and Stearns Drilling Company. The work will occur within the area described as AOC 5, it and will utilize a Media Interface Probe to map the topography on the regional clay and to identify accumulations of propylene dichloride.

On behalf of BASF, Blasland, Bouck & Lee, Inc. continued assembling and evaluating existing sediment and bathymetric data for portions of the Trenton Channel. BASF expects to present the findings and recommendations from this work to the EPA during October.

BASF continues to evaluate potential remediation alternatives.

BASF and ENSR will receive validated analytical results from the soils sampling activities and preliminary analytical results from the first of four rounds of groundwater sampling.

Monitoring well P-35-N has an insufficient column of groundwater for sampling.

BASF and its consultants await formal feedback from EPA on the conceptual groundwater model.

BASF awaits resolution of the mixing zone disagreements between the EPA and the Michigan DEQ.

ENSR will begin preparing the Draft CMS Report, if possible.

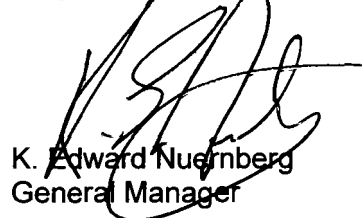
3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule awaiting resolution of issues between the DEQ and EPA concerning the GSI and mixing zones.

BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

This report was completed by:

BASF CORPORATION



K. Edward Nuehnberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1350 0005 4967 7194

August 9, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

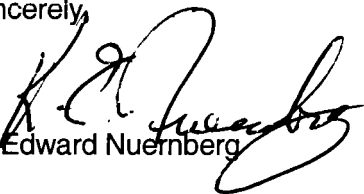
Subject: Monthly Progress Report Number 149
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 149 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2006. Please find attached the CMS Monthly Progress Report Number 98.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES149.doc

cc: Larry Aubuchon – MDEQ Warren
Rhonda Blayer – MDEQ Lansing
Alge Merry – WHI
Jack Lanigan – BASF

Beth Vens – MDEQ Warren
J. Cashin – Bacon Memorial Public Library
Randy Ellis -- ENSR

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel: (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 98

Project:	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Jack Lanigan, (Interim) BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Alge Merry
Reporting Period:	July 1 through July 31, 2006
Date of Report:	August 9, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Representatives from BASF and the EPA discussed the scope of work for installing new monitoring wells and sampling both the new and many existing wells to calculate concentrations of chemicals in background and GSI locations.
- Mr. Lanigan briefed Mr. Thomas on a source control/source removal plan being considered to address AOC-5 -- the PDC Spill Area. Presently, BASF is evaluating a plan to create detailed maps on the surface of the Regional Clay Layer and of the occurrence of PDC on that surface.
- The EPA requested BASF to prepare a work plan describing the well installation program. This request stemmed from a request to the EPA from the Michigan DEQ dated June 13, 2006.
- BASF and ENSR continued to evaluate potential corrective measure alternatives.
- BASF and ENSR collected groundwater elevations from monitoring wells across the entire North Works. Elevations were measured in all accessible wells.
- BASF and ENSR collected samples of soil from approximately 25 locations for chemical analyses. ENSR will use these results to close several data gaps and to calculate statistically valid exposure point concentrations in several AOCs and SWMUs.
- The estimated percent completion of the CMS cannot be determined until BASF and EPA agree on the corrective action objectives.
- BASF continued assembling and evaluating data on sediment quality in the Trenton Channel.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested or made during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives, or Public Interest Groups occurred during this period pertaining to the RCRA CA or the CMS. BASF's Interim Project Coordinator participated in a meeting between representative of the Michigan DEQ and BASF to discuss issues germane to one of the NPDES permitted outfalls at the North Works. His input to the discussion centered on the CMS schedule and progress to date.

1d. Problems/Issues Encountered and Resolutions

BASF awaits EPA's concurrence with proposed new well locations and with selection of existing wells for sampling and use as positions to monitor GSI and background conditions.

BASF awaits EPA's resolution of an ongoing discussion with the DEQ's Water Bureau concerning mixing zones in the Detroit River.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

ENSR collected groundwater elevations across the entire North Works. Maps of the groundwater surfaces are in preparation.

ENSR collected samples of soil from approximately 25 locations. The laboratory currently is analyzing the samples; results are expected during August.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month. Results from the recent data-collection effort will be shared with Waterloo after the data are compiled.

1g. Key Project Personnel Changes

No changes to key personnel occurred during July 2006. Mr. Jack Lanigan continues to serve as BASF Corporation's Project Coordinator on an interim basis.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables or reports were due to the USEPA during the month. No correspondence occurred.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- At the EPA's request, BASF is preparing a work plan describing the well installation activities and the rationale for selected well locations. The work plan will fulfill a request for a plan from the DEQ to the EPA. The work plan will be delivered during August.
- BASF and ENSR await EPA's concurrence with the proposed new well locations prior to beginning drilling.
- ENSR continued preparing a Tier II Risk Evaluation.

- BASF continued assembling and evaluating existing sediment and bathymetric data for portions of the Trenton Channel.
- BASF continues to evaluate potential remediation alternatives.
- BASF and ENSR will receive analytical results from the soils sampling activities.
- BASF and its consultants await formal feedback from EPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report, if possible.

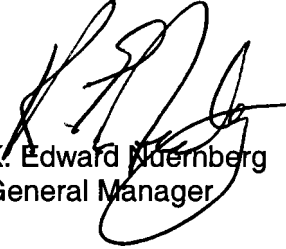
3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule awaiting resolution of issues between the DEQ and EPA concerning the GSI and mixing zones.

BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4846 7401

July 10, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

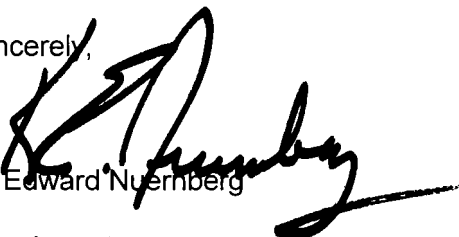
Subject: Monthly Progress Report Number 148
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 148 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2006. Please find attached the CMS Monthly Progress Report Number 97.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES148.doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
JLanigan – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis – ENSR

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 97

Project:	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Jack Lanigan, (Interim) BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Miln Harvey
Reporting Period:	June 1 through June 30, 2006
Date of Report:	July 10, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF submitted a draft activities schedule for installing additional background and GSI wells, collecting and analyzing samples, collecting potentiometric head data, conducting a tier II risk evaluation, and submitting a draft CMS Report. The schedule is dependent upon USEPA's visit to the site to assist in locating the new wells.
- BASF and ENSR International continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF and USEPA agree on the corrective action objectives.
- BASF continued assembling and evaluating data on sediment quality in the Trenton Channel.
- BASF began discussing proposed groundwater sampling locations and proposed locations for new monitoring wells with the USEPA. The USEPA postponed the discussions and BASF awaits rescheduling.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

BASF awaits USEPA's concurrence with proposed new well locations and with selection of existing wells for sampling.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

No changes to key personnel occurred during July 2006. Mr. Jack Lanigan continues to serve as BASF Corporation's Project Coordinator on an interim basis.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables or reports were due to the USEPA during the month. No correspondence occurred.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

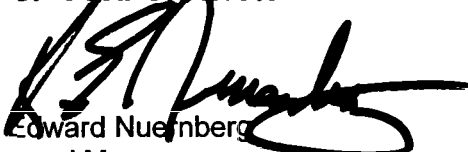
- BASF and ENSR International await USEPA's concurrence with the proposed new well locations prior to scheduling a drilling company.
- ENSR International continue preparations for conducting a Tier II Risk Evaluation.
- BASF continue assembling and evaluating existing sediment and bathymetric data for portions of the Trenton Channel.
- BASF continues to evaluate potential remediation alternatives.
- BASF and ENSR International will measure groundwater elevations within all accessible wells on the property.
- BASF and its consultants await formal feedback from USEPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report, if possible.
- BASF scheduled a meeting with all consulting firms presently engaged with the CMS.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

This report was completed by:

BASF CORPORATION


K. Edward Nuehnberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **July 10, 2006**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**

Fax **(734) 324-6775**

Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7005 1820 0003 4846 7395**

June 7, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 147
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 147 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2006. Please find attached the CMS Monthly Progress Report Number 96.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES147.doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
JLanigan – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis -- ENSR

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 96

Project:	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Jack Lanigan, (Interim) BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Miln Harvey
Reporting Period:	May 1 through May 31, 2006
Date of Report:	June 7, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF submitted a draft activities schedule for installing additional background and GSI wells, collecting and analyzing samples, collecting potentiometric head data, conducting a tier II risk evaluation, and submitting a draft CMS Report. The schedule is dependent upon USEPA's visit to the site to assist in locating the new wells.
- BASF and ENSR International continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF and USEPA agree on the corrective action objectives.
- As requested by USEPA, BASF began assembling and evaluating data on sediment quality in the Trenton Channel.
- BASF provided the USEPA with proposed groundwater sampling locations and proposed locations for new monitoring wells.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA. Await USEPA's concurrence with proposed new well locations and with selection of existing wells for sampling.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

Mr. Bruce Roberts retired from BASF Corporation on June 1, 2006, after 35 years of service. Mr. Jack Lanigan will serve as BASF Corporation's Project Coordinator on an interim basis until further notice.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

BASF issued minutes from the April 11, 2006, meeting after receiving comments from the USEPA participants.

BASF provided the USEPA with proposed groundwater sampling locations. Seven existing wells are proposed for sampling background conditions; thirteen existing wells are proposed for sampling the GSI, and eight new wells are proposed for sampling the GSI.

As requested by the USEPA, BASF presented the USEPA with a copy of the *Field Investigation Report* prepared by Waterloo Hydrogeologic and dated June 2002.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF and ENSR International await USEPA's concurrence with the proposed new well locations prior to scheduling a drilling company.
- ENSR International will continue preparations for conducting a Tier II Risk Evaluation.
- BASF will continue assembling and evaluating existing sediment and bathymetric data for portions of the Trenton Channel.
- BASF will continue to evaluate potential remediation alternatives.
- BASF will have groundwater elevations measured within all accessible wells on the property.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report, if possible.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **June 7, 2006**
Pages **1 of 5**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1160 0002 8942 4767**

May 10, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

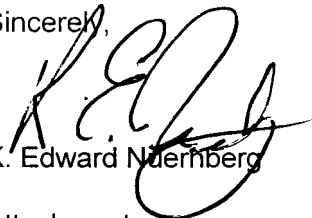
Subject: Monthly Progress Report Number 146
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 146 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2006. Please find attached the CMS Monthly Progress Report Number 95.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES146 doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
BRoberts – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis -- ENSR

BASF Corporation
1609 Biddle Avenue
Wyandotte, MI 48192-3729
Tel (734) 324-6161
www.basf.com/usa

CMS MONTHLY PROGRESS REPORT NO. 95

Project:	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Bruce Roberts, BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Miln Harvey
Reporting Period:	April 1 through April 30, 2006
Date of Report:	May 10, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF and ENSR International met with USEPA in Chicago on April 11th to discuss BASF's proposed corrective action objectives and path forward.
- BASF submitted a draft activities schedule for installing additional background and GSI wells, collecting and analyzing samples, collecting potentiometric head data, conducting a tier II risk evaluation, and submitting a draft CMS Report. The schedule is dependent upon USEPA's visit to the site to assist in locating the new wells.
- BASF and ENSR International continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF and USEPA agree on the corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

No key personnel changes occurred during this period.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables or reports were generated during this period.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- BASF will issue notes from the meeting with USEPA after receiving additional comments from USEPA.
- BASF and ENSR International will select tentative locations for background and GSI wells and submit the information to USEPA for their review.
- ENSR International will begin preparations for conducting a Tier II Risk Evaluation.
- BASF will assemble existing sediment data and bathymetric data in portions of the Trenton Channel and begin to evaluate the information.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report if possible.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is working with USEPA on the schedule.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **May 10, 2006**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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K. Edward Nuernberg
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1160 0002 8942 4750

April 5, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 145
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 144 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2006. Please find attached the CMS Monthly Progress Report Number 94.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES145.doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
BRoberts – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis -- ENSR

CMS MONTHLY PROGRESS REPORT NO. 94

Project:	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Bruce Roberts, BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Miln Harvey
Reporting Period:	March 1 through March 31, 2006
Date of Report:	April 4, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR International will continue re-assessing corrective action objectives.
- BASF and ENSR International continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

No key personnel changes occurred during this period.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables or reports were generated during this period.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- ENSR International will continue re-assessing corrective action objectives, pending the outcome with the meeting with USEPA, and evaluating potential remediation alternatives.
- BASF and ENSR International will meet with USEPA to discuss corrective measures objectives and timing for submitting the Draft CMS Report.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

BASF CORPORATION



K. Edward Muerhberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **April 5, 2006**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

Hard Copy to Follow.



The Chemical Company

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K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1160 0002 8942 4743**

March 2, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 144
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 144 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2006. Please find attached the CMS Monthly Progress Report Number 93.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES144.doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
BRoberts – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis -- ENSR

CMS MONTHLY PROGRESS REPORT NO. 93

Project: Corrective Measures Study
for the BASF Wyandotte North Works Facility
1609 Biddle Avenue
Wyandotte, Michigan 48192

Respondent Project Coordinator: Bruce Roberts, BASF Corporation

ENSR International Project Manager: Randy Ellis
Waterloo Hydrogeologic Project Manager: Miln Harvey

Reporting Period: February 1 through February 28, 2006

Date of Report: March 2, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF sent three copies of the final September 2005 background well sampling report to USEPA.
- ENSR International continued re-assessing corrective action objectives.
- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

No key personnel changes occurred during this period.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

The CMS Supplemental Background Groundwater Sampling Results report was submitted to USEPA during this period.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- ENSR International will continue re-assessing corrective action objectives and evaluating potential remediation alternatives.
- BASF and ENSR International will meet with USEPA to discuss corrective measures objectives and timing for submitting the Draft CMS Report.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1160 0002 8942 1575**

February 6, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

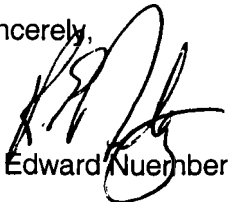
Subject: Monthly Progress Report Number 143
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 143 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2006. Please find attached the CMS Monthly Progress Report Number 92.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES143.doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
BRoberts – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis -- ENSR

CMS MONTHLY PROGRESS REPORT NO. 92

Project: Corrective Measures Study
for the BASF Wyandotte North Works Facility
1609 Biddle Avenue
Wyandotte, Michigan 48192

Respondent Project Coordinator: Bruce Roberts, BASF Corporation

ENSR International Project Manager: Randy Ellis
Waterloo Hydrogeologic Project Manager: Miln Harvey

Reporting Period: January 1 through January 31, 2006

Date of Report: February 6, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR International submitted the draft report summarizing the results from the September background well sampling to BASF for comments.
- BASF reviewed the draft report and gave comments to ENSR.
- ENSR International continued re-assessing corrective action objectives
- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

No key personnel changes occurred during this period.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables were submitted to USEPA during this period.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- ENSR International will revise the draft report summarizing the results from the September background well sampling and submit a final report to BASF.
- BASF will send the final report to USEPA.
- BASF and ENSR International will meet with USEPA to discuss corrective measures objectives.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- ENSR will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager

Feb. 6. 2006 1:15PM

No. 2903 P. 1



The Chemical Company

Fax Cover Sheet

To Mr. Juan Thomas
US Environmental Protection Agency
Fax (312) 353-4788
Phone
Date February 6, 2006
Pages 1 of 4
Subject EPA Monthly Progress Report
cc

From K. Edward Nuernberg

Fax (734) 324-6775

Phone (734) 324-6161

Comments:

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The Chemical Company

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Products Better™

K. Edward Nuernberg
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:
7004 1160 0002 8942 1568**

January 9, 2006

Mr. Juan Thomas
Project Manager
United States Environmental Protection Agency
Region V (DE-9J)
77 West Jackson Street
Chicago, Illinois 60604

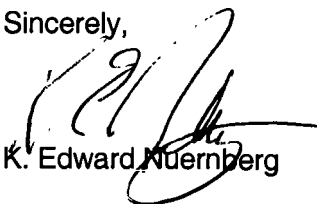
Subject: Monthly Progress Report Number 142
RCRA Corrective Action
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 142 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2005. Please find attached the CMS Monthly Progress Report Number 91.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES142.doc

cc: LAubuchon – MDEQ Warren
RBlayer – MDEQ Lansing
MHarvey – WHI
BRoberts – BASF

BVens – MDEQ Warren
JCashin – Bacon Memorial Public Library
REllis -- ENSR

CMS MONTHLY PROGRESS REPORT NO. 91

Project:	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
Respondent Project Coordinator:	Bruce Roberts, BASF Corporation
ENSR International Project Manager: Waterloo Hydrogeologic Project Manager:	Randy Ellis Miln Harvey
Reporting Period:	December 1 through December 31, 2005
Date of Report:	January 9, 2006

1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- ENSR International continued preparing the draft report summarizing the results from the September background well sampling.
- BASF responded to USEPA's letter dated December 8th.
- ENSR International began re-assessing corrective action objectives
- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

1g. Key Project Personnel Changes

ENSR International has replaced Parsons Engineering Science and was given the responsibility of completing the CMS.

2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD

No deliverables were submitted to USEPA during this period.

3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

3a. Anticipated Work

- ENSR International will complete the draft report summarizing the results from the September background well sampling and submit it to BASF for comments.
- BASF and ENSR International will meet with USEPA to discuss corrective measures objectives.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

3b. Anticipated Problems and Proposed Resolutions

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

BASF CORPORATION



K. Edward Nuernberg
General Manager



The Chemical Company

Fax Cover Sheet

To **Mr. Juan Thomas**
US Environmental Protection Agency
Fax **(312) 353-4788**
Phone
Date **January 9, 2006**
Pages **1 of 4**
Subject **EPA Monthly Progress Report**
cc

From **K. Edward Nuernberg**
Fax **(734) 324-6775**
Phone **(734) 324-6161**

Comments:

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